

# **EXHIBIT 7**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRITAX CHILD SAFETY, INC.,	)	
	)	
Plaintiff,	)	
	)	Civil Action NO. 5:17-cv-02724-JFL
v.	)	
	)	
NUNA INTERNATIONAL B.V. and	)	
NUNA BABY ESSENTIALS, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS' INVALIDITY CONTENTIONS**

On July 1, 2019, Britax Child Safety Inc. ("Plaintiff" or "Britax") served upon Defendants Nuna International B.V. and Nuna Baby Essentials, Inc., (collectively, "Nuna" or "Defendants"), its Disclosure of Infringement Contentions ("Infringement Contentions"). In its Contentions, Britax asserted U.S. Patent Nos. 9,586,504 ("the '504 patent") and 9,499,074 ("the '074 patent") (collectively, "the Asserted Patents") against Defendants as set forth below.

Patent	Asserted Claims
'504 patent	Claims 1-15
'074 patent	Claims 1-3, 5-7, and 16

Defendants hereby serve their Invalidity Contentions for the Asserted Claims of the Asserted Patents and related prior art references and prior use, sale, and/or other availability.

Defendants' Invalidity Contentions are based on reasonably available information. Defendants expressly reserve the right to further amend or supplement these Invalidity Contentions after further investigation, discovery, evaluation of the scope and content of the prior art, admissions, the Court's claim construction, any later clarification or alteration of the

meaning of the claim terms, or any other reasonable basis, as permitted by the Local Rules of the Eastern District of Pennsylvania and the Federal Rules of Civil Procedure. Further, nothing in these Invalidity Contentions may be treated as an admission that any accused product meets any limitation of the Asserted Claims.

With respect to the Asserted Claims, and based on the case to date, Defendants hereby: (1) identify each currently known item of prior art that either anticipates or renders obvious the Asserted Claims; (2) specify whether each such item of prior art (or combination of the same) anticipates or renders obvious the Asserted Claims; (3) submit charts identifying where specifically in each item of prior art each element of the Asserted Claims is found; and (4) identify the grounds of how the Asserted Claims are invalid based on 35 U.S.C. § 112.

Defendants' Invalidity Contentions are based on their current understanding of the Asserted Claims and/or the apparent claim constructions Defendants believe Britax to be asserting based on Britax's Infringement Contentions without conceding to such claim constructions. Defendants reserve the right to amend or revise these contentions based on the Court's claim construction ruling, or any other later clarification or alteration of the meaning of claim terms. To the extent that Defendants' Invalidity Contentions reflect constructions of claim limitations consistent with, similar to, or implicit in Britax's Infringement Contentions, no inference is intended nor should any be drawn that Defendants agree with Britax's claim constructions. Defendants expressly reserve the right to submit their own claim constructions and contest Britax's constructions of the Asserted Claims at the appropriate time.

Defendants' Invalidity Contentions may be in the alternative to any position they may ultimately take as to any claim construction issues. Defendants' contentions for particular references are not necessarily intended to be consistent with their contentions for other

references and should not be otherwise construed. To the extent Defendants determine that a different meaning is appropriate for any claim term, they will assert that according to the Court's procedures and at the appropriate time. Prior art not included in Defendants' Invalidity Contentions may become relevant depending on the positions Britax asserts, and additional prior art may be uncovered during the course of discovery. Accordingly, Defendants reserve the right to amend the Invalidity Contentions by adding or withdrawing prior art to or from these Contentions and/or modifying the charts herein in light of any revised or supplemented infringement contentions by Britax, any positions taken by Britax in related litigation, reexamination, or other proceedings in the future, or as otherwise appropriate.

The obviousness combinations of references provided below under 35 U.S.C. § 103 are merely exemplary and are not intended to be exhaustive. Additional combinations of the references are possible, and Defendants reserve the right to use any such combinations. In particular, Defendants are currently unaware of the extent to which, if at all, Britax will contend that limitations of the Asserted Claims are not disclosed in the art identified by Defendants as anticipatory, limitations not disclosed in the specification of each Asserted Patent and related applications would have been known to persons of ordinary skill in the art at the appropriate time, or any of the identified references does not qualify as prior art under Section 102. To the extent that such an issue arises, Defendants reserve the right to supplement or identify other references that would supplement the relevant disclosures.

Defendants do not concede that Britax's Infringement Contentions meet the specificity required in this proceeding, and Defendants provide these Invalidity Contentions without waiving any right to receive from Britax's full and complete specific infringement contentions. Moreover, nothing herein is an admission in any way that any Accused Product infringes any of

the Asserted Claims.

Additionally, based on the case to date, Defendants are also concurrently producing documents currently in their possession, custody, or control required to accompany these Invalidity Contentions.

### **I. Incorporation by Reference of Related Invalidity Contentions and Disclosures**

Defendants hereby produce with these Invalidity Contentions, and explicitly incorporates by reference as if fully set forth herein, and intends to rely on, each of the contentions, prior art references, and other statements made or disclosed in the following requests for *inter partes* review and any other proceeding involving the Asserted Patents:

<b>Patent</b>	<b>Inter Partes Review Case No.</b>	<b>Claims</b>	<b>Filing Date</b>
'504 patent	IPR2018-01683	13-15	Sep. 10, 2018
'074 patent	IPR2019-00066	1-9, 11-14, and 16-17	Oct. 12, 2018

Defendants incorporate by reference all contentions, charts, prior art references, and other statements relating to any ground of invalidity identified by any potential or actual licensee to the Asserted Patents and by any party in any other past, present, and future litigation involving the Asserted Patents and patents related to the Asserted Patents. Defendants incorporate by reference all grounds of invalidity identified in any present or future *ex parte* reexamination, *inter partes* review, covered business method patent review, post-grant review other post-issuance review by the United States Patent and Trademark Office (“USPTO”) of the Asserted Patents, or review by any other judicial or administrative proceeding. Defendants also incorporate by reference the production of documents associated with any grounds for invalidity for the Asserted Patents identified in this paragraph. Further, Defendants incorporate any grounds of invalidity known to Britax or any affiliated party whether or not disclosed.

## **II. Ongoing Investigation**

Defendants' discovery and investigation in connection with this lawsuit is continuing; and thus, these Invalidity Contentions are based on information obtained to date. Among other things, discovery is still underway, witnesses remain to be deposed, and the Court has not yet construed the terms of the Asserted Claims. Accordingly, Defendants' Invalidity Contentions are subject to modification, amendment, or supplementation in accordance with the Local Rules of the Eastern District of Pennsylvania and the Federal Rules of Civil Procedure, and/or any other applicable authority as this action progresses and additional information is obtained.

## **III. Identification of Prior Art and Challenges**

Subject to their Reservation of Rights set forth above, Defendants state that the Asserted Claims are invalid under one or more of 35 U.S.C. §§ 102, 103 and 112 for at least the reasons identified below and identified in Exhibits A1-A4 and B1-B4. Defendants state that their Invalidity Contentions under 35 U.S.C. §§ 102 and 103 are made in the alternative to their contentions that the Asserted Claims should be invalidated under 35 U.S.C. § 112 (for indefiniteness and/or lack of enablement and/or written description), and without the benefit of claim construction. Defendants reserve all rights to amend these Invalidity Contentions for the claim construction entered by the Court.

Defendants contend that the prior art disclosed below generally relates to child seats and is relevant at least as background of the art to each of the Asserted Patents, irrespective of the sub-section in which they are expressly cited. Defendants expressly reserve the right to use and rely on any of the prior art cited herein to establish invalidity of the asserted patents or to otherwise support Defendants' contentions as to what was known in the state of the art during the pertinent time frame for each of the

Asserted Patents.

In addition to the references specifically identified in Exhibits A1-A4 and B1-B4, Defendants also reserve the right to rely on any of the patents or publications deriving from applications in the respective claimed priority chains of the Asserted Patents, the references cited on the face of the Asserted Patents and related patents, the admitted prior art references in the specifications of the Asserted Patents and related patents, the prosecution history of the Asserted Patents and related patents, the references cited in any USPTO (including Patent Trial and Appeal Board (“PTAB”)) proceedings related to the Asserted Patents or related patents, any references known to Britax or any affiliated party and the references cited in any invalidity contentions that have been or will be submitted in any action or proceedings involving the Asserted Patents or related patents. Defendants may also rely on expert testimony and any additional prior art located or developed during the course of discovery. Furthermore, Defendants may rely on any of the prior art references in these Invalidity Contentions to demonstrate a motivation to combine. Defendants may also rely on expert testimony to demonstrate a motivation to combine.

Defendants may also rely on (i) foreign counterparts of U.S. patents identified in these invalidity contentions; (ii) U.S. counterparts of foreign patents and foreign patent applications identified in these invalidity contentions; and (iii) U.S. and foreign patents and patent applications corresponding to articles and publications identified in these Invalidity Contentions. Moreover, Defendants reserve the right to rely on uncited portions of the identified prior art, rely on other references (irrespective of whether such references themselves qualify as prior art) to show the state of the art, and/or to

rely on expert testimony to provide context to, or aid in, understanding the cited portions of the identified prior art.

**A. Anticipation and Obviousness**

Defendants identify each item of prior art that renders unpatentable the Asserted Claims in Tables 1, 2, and 3 below. Table 1 provides the identity of each prior art patent and patent application, including the number, country of origin, and date of issuance and/or publication. Table 2 provides the identity of each prior art publication, including the title and date of publication. Table 3 provides the identity of each system sold including the name of the system, the date of public use, sale, offer to sale, or public disclosure, and where feasible, the entity. The patents and printed publications constitute prior art under one or more of AIA 35 U.S.C. §§ sections 102(a)(1) or 102(a)(2).

Discovery is ongoing, and Defendants' prior art investigation and third-party discovery is therefore not yet complete. Defendants reserve the right to present additional items of prior art under 35 U.S.C. § 102 and/or § 103 that are located during the course of discovery or further investigation. For example, Defendants expect to receive documents from third parties either through informal requests or under subpoenas that are believed to have knowledge, documentation, and/or corroborating evidence concerning some of the prior art listed in Tables 1, 2, and 3 and/or additional prior art. These third parties include without limitation the authors, inventors, or assignees of the references listed in these disclosures.

In addition, Defendants reserve the right to assert invalidity under other sections of 35 U.S.C. § 102 to the extent that discovery or further investigation yield information forming the basis for such invalidity.



**Table 1: Prior Art Patents and Patent Applications<sup>1</sup>**

<b>Patent, Patent Publication, or Application Number</b>	<b>Issue or Publication Date</b>	<b>Country of Origin</b>
US 5,186,063	Feb. 16, 1993	United States
US 5,228,746	July 20, 1993	United States
US 5,286,086	Feb. 15, 1994	United States
US 5,611,596	Mar. 18, 1997	United States
US 5,671,971	Sept. 30, 1997	United States
US 5,791,359	Aug. 11, 1998	United States
US 5,810,435	Sept. 22, 1998	United States
US 5,839,789	Nov. 24, 1998	United States
US 5,902,015	May 11, 1999	United States
US 5,979,982	Nov. 9, 1999	United States
US 6,024,408	Feb. 15, 2000	United States
US 6,053,532	Apr. 25, 2000	United States
US 6,092,869	July 25, 2000	United States
US 6,139,099	Oct. 31, 2000	United States
US 6,152,528	Nov. 28, 2000	United States
US 6,170,911	Jan. 9, 2001	United States
US 6,508,510	Jan. 21, 2003	United States
US 6,539,590	Apr. 1, 2003	United States
US 6,672,664	Jan. 6, 2004	United States
US 6,779,842	Aug. 24, 2004	United States
US 6,902,194	June 7, 2005	United States

<sup>1</sup> Defendants contend that the “Priority Date” listed in Table 1 corresponds to the latest priority date of the document or item, based on the date listed on or associated with the document or item. Discovery has not concluded in this Investigation. Accordingly, Defendants reserve the right to assert a different Priority Date for each item listed.

<b>Patent, Patent Publication, or Application Number</b>	<b>Issue or Publication Date</b>	<b>Country of Origin</b>
US 7,029,068	Apr. 18, 2006	United States
US 7,059,676	June 13, 2006	United States
US 7,163,265	Jan. 16, 2007	United States
US 7,195,315	Mar. 27, 2007	United States
US 7,258,189	Aug. 21, 2007	United States
US 7,261,376	Aug. 28, 2007	United States
US 7,300,113	Nov. 27, 2010	United States
US 7,753,445	July 13, 2010	United States
US 7,866,703	Jan. 11, 2011	United States
US 8,262,161	Sept. 11, 2012	United States
US 8,550,555	Oct. 8, 2013	United States
US 8,573,695	Nov. 5, 2013	United States
US 8,690,244	Apr. 8, 2014	United States
US 8,845,022	Sept. 30, 2014	United States
US 9,187,016	Nov. 17, 2015	United States
US 2001/0004163	June 21, 2001	United States
US 2002/0043838	Apr. 18, 2002	United States
US 2003/0127894	July 10, 2003	United States
US-2004/0070246	Apr. 15, 2004	United States
US 2004/0232747	Nov. 25, 2004	United States
US 2005/0146183	July 7, 2005	United States
US 2005/0184567	Aug. 25, 2005	United States
US 2006/0006714	Jan. 12, 2006	United States
US 2006/0091709	May 4, 2006	United States
US 2011/0272983	Nov. 10, 2011	United States

<b>Patent, Patent Publication, or Application Number</b>	<b>Issue or Publication Date</b>	<b>Country of Origin</b>
US 2012/0007397	Jan. 12, 2012	United States
US 2012/0007398	Jan. 12, 2012	United States
US 2013/0119732	May 16, 2013	United States
US 2015/0115676	Apr. 30, 2015	United States
AU 1 821 800	June 13, 2000	Australia
AU 2 657 097	Nov. 12, 1997	Australia
AU 2 982 301	Nov. 15, 2001	Australia
AU 3 787 697	Mar. 6, 1998	Australia
AU 2001-29823	Nov. 15, 2001	Australia
AU 2003-296874	June 3, 2004	Australia
CA 2,049,739	Feb. 25, 1992	Canada
CA 2,084,321	June 6, 1993	Canada
CA 2,247,597	Mar. 15, 2000	Canada
CA 2,526,156	Jan. 6, 2005	Canada
CN 1100692	Mar. 29, 1995	China
CN 2209069	Oct. 4, 1995	China
CN 2247113	Feb. 12, 1997	China
DE 295 13 774	Jan. 4, 1996	Germany
DE 297 15 020	Nov. 13, 1997	Germany
DE 197 22 096	Dec. 3, 1998	Germany
EP 0 200 411	Dec. 10, 1986	Europe
EP 0 323 334	July 5, 1989	Europe
EP 0 732 235	Sept. 18, 1996	Europe
EP 0 816 161	Jan. 7, 1998	Europe
EP 0 822 115	Feb. 4, 1998	Europe
EP 0 853 018	July 15, 1998	Europe

<b>Patent, Patent Publication, or Application Number</b>	<b>Issue or Publication Date</b>	<b>Country of Origin</b>
EP 0 931 693	July 28, 1999	Europe
EP 1 077 152	Feb. 21, 2001	Europe
EP 1 110 806	June 27, 2001	Europe
EP 1 232 902	Aug. 21, 2002	Europe
EP 1 199 213	Apr. 24, 2002	Europe
EP 1 344 678	Sept. 17, 2003	Europe
EP 1 369 296	Dec. 10, 2003	Europe
EP 1 403 131	Mar. 31, 2004	Europe
EP 1 418 085	May 12, 2004	Europe
EP 1 623 868	Feb. 8, 2006	Europe
EP 1 623 892	Feb. 6, 2008	Europe
EP 1 997 671	Dec. 3, 2008	Europe
EP 1 407 922	Mar. 4, 2009	Europe
EP 1 110 806	Apr. 1, 2009	Europe
EP 2 080 664	July 22, 2009	Europe
EP 1 612 091	Dec. 9, 2009	Europe
EP 2 322 379	May 18, 2011	Europe
FR 2 735 001	Dec. 13, 1996	France
JP 2001-180348	July 3, 2001	Japan
JP 2002-316565	Oct. 29, 2002	Japan
RU 2334631	Sept. 27, 2008	Russia
WO 1997/39913	Oct. 30, 1997	WIPO (Europe)
WO 1998/06289	Feb. 19, 1998	WIPO (Europe)
WO 2000/09367	Feb. 24, 2000	WIPO (Europe)
WO 2000/21803	Apr. 20, 2000	WIPO (Europe)

<b>Patent, Patent Publication, or Application Number</b>	<b>Issue or Publication Date</b>	<b>Country of Origin</b>
WO 2000/30886	June 2, 2000	WIPO
WO 2004/033251	Apr. 22, 2004	WIPO (China)
WO 2005/000625	Jan. 6, 2005	WIPO (Canada)
US 7,901,003	Mar. 8, 2011	United States
US 4,913,490	Apr. 3, 1990	United States
H05-185869	July 27, 1993	Japan
US 6,592,183	July 15, 2003	United States
US 5,630,645	May 20, 1997	United States
US 2013/0088057	Apr. 11, 2013	United States
CN 102189947	Sept. 21, 2011	China
EP 2 090 458	Aug. 19, 2009	Europe
US 5,957,531	Sept. 28, 1999	United States
EP 0 813 992	Dec. 29, 1997	Europe
FR 2 745 535	May 9, 1997	France
US 4,436,341	Mar. 13, 1984	United States
US 5,567,007	Oct. 22, 1996	United States
US 5,915,787	June 29, 1999	United States
US 6,220,662	Apr. 24, 2001	United States
US 6,447,060	Sept. 10, 2002	United States
US 7,216,932	May 15, 2007	United States
US 7,658,446	Feb. 9, 2010	United States
US 7,926,874	Apr. 19, 2011	United States
US 7,988,230	Aug. 2, 2011	United States
US 8,322,788	Dec. 4, 2012	United States
US 8,973,992	Mar. 10, 2015	United States

<b>Patent, Patent Publication, or Application Number</b>	<b>Issue or Publication Date</b>	<b>Country of Origin</b>
US 13/602,846		USPTO

**Table 2: Prior Art Publications<sup>2</sup>**

<b>Title</b>	<b>Date of Publication</b>
Boulevard 70 CS User Guide	2011
Examination Report Office Action of corresponding Korean Patent Application No. 10-2014-0144267 of corresponding Australian Patent Application No. 2014240201	July 12, 2016
Extended European Search Report for European Patent Application No. 13004238.5	Nov. 21, 2013
Extended European Search Report and Written Opinion of co-pending European Patent Application No. 14003614.6;	Mar. 5, 2015
Office Action for U.S. Patent Application No. 13/602,846	Feb. 5, 2014
Office Action and translation from Patent Office of the Russian Federation for corresponding Russian Patent Application No. 201339691/11	Oct. 7, 2014
Office Action and translation from Korean Intellectual Property Office for corresponding Korean Patent Application No. 10-2013-0105120	Oct. 17, 2014

<sup>2</sup> Defendants contend that the “Date of Publication” listed in Table 2 corresponds to the latest priority of the document or item, based on the date listed on or associated with the document or item. Discovery has not concluded in this Investigation. Accordingly, Defendants reserve the right to assert a different Date of Publication for each item listed.

<b>Title</b>	<b>Date of Publication</b>
Office Action of corresponding Canadian Patent Application No. 2,825,694	Dec. 15, 2014
Office Action from Korean Patent Application No. 10-2013-0105120	Apr. 28, 2015
Office Action from U.S. Patent Application No. 14/273,804	May 26, 2015
Office Action from Chinese Patent Application No. 201310398750.4	June 15, 2015
Office Action and translation from Korean Intellectual Property Office for corresponding Korean Patent Application No. 10-2014-0144267	Nov. 17, 2015
Office Action and translation from Korean Intellectual Property Office for corresponding Korean Patent Application No. 10-2013-0105120	Nov. 23, 2015
Office Action of corresponding Korean Patent Application No. 10-2014-0144267	May 9, 2016
Office Action of corresponding Chinese Patent Application No. 201410573558.9	May 27, 2016
Patent Examination Report No. 1 of co-pending Australian Patent Application No. 2013221904	Mar. 13, 2015
Search Report from Chinese Patent Application No. 201310398750.4	June 15, 2015
Misuse of Child Restraints	Jan. 2004
Drivers' Mistakes When Installing Child Seats	Dec. 2009

<b>Title</b>	<b>Date of Publication</b>
Petition for Inter Partes Review No. 2018-01683	Sept. 10, 2018
Petition for Inter Partes Review No. 2019-00066	Oct. 12, 2018
Declaration of Andrew Bowman regarding Inter Partes Review No. 2018-01683	Sept. 10, 2018
Declaration of Andrew Bowman regarding Inter Partes Review No. 2019-00066	Oct. 12, 2018
Examination report from corresponding Chinese application number 201710130576.3	Sept. 25, 2018
Office Action of corresponding European Patent Application No. 13004238.5	Feb. 20, 2017
Uppa-Baby Instruction Manual	2012
Britax B-Safe 35 User Guide	2011
Graco Smart Seat Owner's Manual	2010
Britax Frontier Clicktight User Guide	2013



**Table 3: Prior Art Public Use / Sales / Offers for Sale / Disclosure<sup>3</sup>**

<b>Entity that Made Use / Offer / Known</b>	<b>Item Offered for Sale / Publicly Used / Known [Herein Referenced As]</b>	<b>Date of Use / Sale / Offer / Public Disclosure</b>	<b>Exemplary Evidence</b>
Britax	Boulevard 70 CS	2011	<p>Boulevard 70 CS User Guide</p> <p>BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and One Lock-offs (Jan. 6, 2011), available at <a href="https://www.youtube.com/watch?v=F6V_kscSxKE">https://www.youtube.com/watch?v=F6V_kscSxKE</a></p> <p>BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and One Lock-offs (Jan. 6, 2011), available at <a href="https://www.youtube.com/watch?v=OrL4oZaEwuk">https://www.youtube.com/watch?v=OrL4oZaEwuk</a></p> <p>BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-offs (Jan. 6, 2011), available at <a href="https://www.youtube.com/watch?v=7koBM82iYlw&amp;t=4s">https://www.youtube.com/watch?v=7koBM82iYlw&amp;t=4s</a></p> <p>BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-offs (Jan. 6, 2011), available at <a href="https://www.youtube.com/watch?v=IlgD5S-9NFE&amp;t=66s">https://www.youtube.com/watch?v=IlgD5S-9NFE&amp;t=66s</a></p>
Graco	Smart Seat	2010	<p>Graco Smart Seat Owner's Manual</p> <p>Graco Smart Seat All-in-one Car Seat (Oct. 14, 2011), available at <a href="https://www.youtube.com/watch?v=yyfe6r6mxTs">https://www.youtube.com/watch?v=yyfe6r6mxTs</a></p>

<sup>3</sup> Defendants contend that the "Date of Use / Sale / Offer / Public Disclosure" listed in Table 3 corresponds to the latest priority of the item, based on the date associated with the item. Discovery has not concluded in this Investigation. Accordingly, Defendants reserve the right to assert a different Date of Use / Sale / Offer / Public Disclosure for each item listed.

Entity that Made Use / Offer / Known	Item Offered for Sale / Publicly Used / Known [Herein Referenced As]	Date of Use / Sale / Offer / Public Disclosure	Exemplary Evidence
			Graco Smart Seat All-in-one Car Seat (Sept. 20, 2011), available at <a href="https://www.youtube.com/watch?v=_UIIYn0JIXc">https://www.youtube.com/watch?v=_UIIYn0JIXc</a>
Chicco	NextFit	February, 2013	<p>NextFit User Guide: SuperCinch (Feb. 11, 2013), available at <a href="https://www.youtube.com/watch?v=PxzjPWcmasg">https://www.youtube.com/watch?v=PxzjPWcmasg</a></p> <p>NextFit User Guide: Belt Path (Feb. 11, 2013), available at <a href="https://www.youtube.com/watch?v=yYyDP02WkQc">https://www.youtube.com/watch?v=yYyDP02WkQc</a></p> <p>NextFit User Guide: Tether (Feb. 11, 2013), available at <a href="https://www.youtube.com/watch?v=yLBlsLqvxQg">https://www.youtube.com/watch?v=yLBlsLqvxQg</a></p> <p>NextFit Car Seat Demonstration (Feb. 8, 2013), available at <a href="https://www.youtube.com/watch?v=JrkDrPwQb2Q">https://www.youtube.com/watch?v=JrkDrPwQb2Q</a></p>
Britax	Frontier Clicktight	March, 2013	<p>Frontier Clicktight User Guide</p> <p>Frontier 90 and Pinnacle 90 - Installation Using the Vehicle Lap-Shoulder Belt (May 2, 2013), available at <a href="https://www.youtube.com/watch?v=dyHQueONSas">https://www.youtube.com/watch?v=dyHQueONSas</a></p>
Britax	B-SAFE	2012	<p>Britax B-Safe 35 User Guide</p> <p>BRITAX B-SAFE: Installing the Base using the LATCH System (Feb. 15, 2012), available at <a href="https://www.youtube.com/watch?v=_fFzGs9GnEM">https://www.youtube.com/watch?v=_fFzGs9GnEM</a></p> <p>BRITAX B-SAFE: Installing the Base using the Vehicle Lap-Shoulder Seat Belt (Feb. 15, 2012), available at <a href="https://www.youtube.com/watch?v=cB32Z4OsZVc">https://www.youtube.com/watch?v=cB32Z4OsZVc</a></p>

Entity that Made Use / Offer / Known	Item Offered for Sale / Publicly Used / Known [Herein Referenced As]	Date of Use / Sale / Offer / Public Disclosure	Exemplary Evidence
			BRITAX B-SAFE: Installing the Base using the Vehicle Lap Belt Only (Feb. 15, 2012), available at <a href="https://www.youtube.com/watch?v=ELifhV4BM1o">https://www.youtube.com/watch?v=ELifhV4BM1o</a>
Britax	Pinnacle Clicktight	March, 2013	Frontier 90 and Pinnacle 90 - Installation Using the Vehicle Lap-Shoulder Belt (May 2, 2013), available at <a href="https://www.youtube.com/watch?v=dyHQueONSas">https://www.youtube.com/watch?v=dyHQueONSas</a>
Uppa Baby	Mesa	2012	Uppa-Baby Instruction Manual  UPPAbaby MESA Overview (North America) (Aug. 21, 2013), available at <a href="https://www.youtube.com/watch?v=XA4iEccJ05k">https://www.youtube.com/watch?v=XA4iEccJ05k</a>

The above lists are not exclusive. Defendants reserve the right to rely on both the listed references as well as other art that may become known and/or relevant during the course of this matter. Any citation to one or more of these prior art references, or other prior art references regarding any method or system, should be construed to constitute not only a citation to the prior art reference itself but also a reference to the system itself. Discovery is ongoing in this case, and Defendants will supplement if and when more information becomes available.

### 1. Anticipatory Prior Art

To be anticipatory, a reference must describe, either expressly or inherently, each and every claim limitation and enable one of skill in the art to practice an embodiment of the claimed invention without undue experimentation. *Stored Value Sol., Inc. v. Card Activation Techs., Inc.*, 2012 WL 6097674, at \*8 (Fed. Cir. 2012). A reference may anticipate inherently if a claim limitation that is not expressly disclosed “is necessarily present, or inherent, in the single

anticipating reference.” *In re Aoyama*, 656 F.3d 1293, 1337 (Fed. Cir. 2011) (quoting *Schering Corp. v. Geneva Pharm., Inc.*, 339 F.3d 1373, 1377 (Fed. Cir. 2003)); *Akamai Techs., Inc. v. Cable & Wireless Internet Servs., Inc.*, 344 F.3d 1186, 1195 (Fed. Cir. 2003).

The Asserted Claims are invalid under 35 U.S.C. § 102 because a single prior art reference, as viewed by, and with the knowledge of one of ordinary skill in the art at the time of the alleged inventions, expressly or inherently discloses each and every limitation of the claimed invention. Subject to Defendants reservation of rights in these Invalidity Contentions, prior art references anticipating the Asserted Claims of each of the asserted patents are listed in the above Tables 1-3. Exhibits are provided with claim charts for each reference as applicable to a given Asserted Patents.

Depending on the construction of the claims of the Asserted Patents, and/or positions that Britax or its expert witnesses may take concerning claim interpretation, infringement, and/or invalidity issues, different ones of the charted prior art references in the Exhibits may be of greater or lesser relevance and different combinations of these references may be implicated. Given the uncertainty, the charts may reflect alternative applications of the prior art against the Asserted Claims.

The prior art cited in the Tables and Exhibits is illustrative and not exhaustive. Though these claim charts provide illustrative citations to where each element may be found in the prior art references, the cited references may contain other disclosures of each claim element as well, and Defendants reserve the right to rely on other, non-cited portions of these references. If Britax asserts that any of these references fails to disclose one or more elements of the Asserted Claims, Defendants reserve the right to use one or more of these references as prior art under 35 U.S.C. § 103.

## 2. Prior Art/Combinations that Render the Asserted Claim Obvious

A claimed invention is obvious when a person of ordinary skill in the art would have been motivated to modify a prior art reference or combine the teaching of the prior art references to achieve the claimed invention, and the person of ordinary skill in the art would have had a reasonable expectation of success in doing so. *See, e.g., Unigene Labs., Inc. v. Apotex, Inc.*, 655 F.3d 1352, 1360 (Fed. Cir. 2011). “Any need or problem known in the field of endeavor at the time of invention and addressed by the patent can provide a reason for combining the elements in the manner claimed.” *See KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 420 (2007). While an analysis of any teaching, suggestion, or motivation to combine elements from different prior art references is useful in an obviousness analysis, the overall inquiry must be expansive and flexible, and must include the common sense and ordinary creativity of a person having ordinary skill in the art as part of the analysis. *Id.* at 419-21.

Subject to Defendants’ reservation of rights stated in these Invalidity Contentions and based on Defendants’ present understanding of the Asserted Claims, and the proposed constructions Britax is asserting, the prior art references identified in these Invalidity Contentions each anticipate and/or render obvious the Asserted Claims of the corresponding patents.

In addition to the grounds of anticipation outlined above, the prior art references from Tables 1-3 also render obvious the Asserted Claims of the Asserted Patents, as outlined in the enclosed claim charts.

## 3. Prior Art Challenges (Exhibits A1-A4 and B1-B4)

Defendants further provide exemplary, non-limited challenges based on anticipation and obviousness in Exhibits A1-A4 and B1-B4. Defendants reserve the right to supplement the obviousness arguments listed below using any references listed in these Invalidity Contentions

and any other references including those that may become known or that may become known to be relevant during the course of discovery. Defendants further reserve the right to rely upon combinations of references disclosed within the prosecution histories of the Asserted Patents with the references cited herein.

These challenges are subject to supplementation and amendment after the Court issues its claim construction ruling, if and when Britax provides supplemental Infringement Contentions, or as otherwise appropriate.

**a. '074 Patent**

**i. *Meeker***

As explained in the chart in Exhibit A1, the Asserted Claims of the '074 patent are rendered unpatentable under 35 U.S.C. §§ 102 and/or 103, depending upon the claim construction adopted in this case, by U.S. Patent No. 7,901,003 B2 to Meeker et al. ("*Meeker*") alone, or in combination with one or more other prior art references, as further identified below.

**'074 Patent - Claims 1-3, 5-7, and 16**

- *Meeker* anticipates and/or renders obvious claims 1-3, 5-7, and 16.
- *Meeker* in combination with U.S. Patent No. 6,508,510 B2 ("*Yamazaki*"), Japanese Laid-open Patent Publication No. H5-185869 ("*Washimi*"), European Patent Application No. EP0822115A2 ("*Wetter*"), the Uppa Baby Mesa ("*Uppa Baby Mesa*"), the Britax B-Safe 35 ("*B-Safe 35*") U.S. Patent No. 8,322,788 B2 ("*Williams*") and/or the Graco Smart Seat ("*Graco Smart Seat*") renders obvious claims 1-3, 5-7, and 16.

**ii. *Takahashi***

As explained in the chart in Exhibit A2, the Asserted Claims of the '074 patent are rendered unpatentable under 35 U.S.C. §§ 102 and/or 103, depending upon the claim construction adopted in this case, by U.S. Patent No. 4,913,490 to Takahashi ("*Takahashi*") alone, or in combination with one or more other prior art references, as further identified below.

**'074 Patent - Claims 1-3, 5-7, and 16**

- *Takahashi* anticipates and/or renders obvious claims 1-3, 5-7, and 16.
- *Takahashi* in combination with *Yamazaki*, *Washimi*, and/or *Wetter*, renders obvious claims 1-3, 5-7, and 16.

**iii. *Boulevard 70 CS***

As explained in the chart in Exhibit A3, the Asserted Claims of the '074 patent are rendered unpatentable under 35 U.S.C. §§ 102 and/or 103, depending upon the claim construction adopted in this case, by the Britax Boulevard 70 Child Seat ("*Boulevard 70 CS*") alone, or in combination with one or more other prior art references, as further identified below.

'074 Patent - Claims 1-3, 5-7, and 16

- *Boulevard 70 CS* anticipates and/or renders obvious claims 1-3, 5-7, and 16.
- *Boulevard 70 CS* in combination with *Yamazaki*, *Washimi*, *Wetter*, the *Uppa Baby Mesa*, the *B-Safe 35*, *Williams*, and/or the *Graco Smart Seat* renders obvious claims 1-3, 5-7, and 16.

**iv. *Yamazaki***

As explained in the chart in Exhibit A4, the Asserted Claims of the '074 patent are rendered unpatentable under 35 U.S.C. § 103, depending upon the claim construction adopted in this case, by *Yamazaki* alone, or in combination with one or more other prior art references, as further identified below.

'074 Patent - Claims 1-3, 5-7, and 16

- *Yamazaki* renders obvious claims 1-3, 5-7, and 16.
- *Yamazaki* in combination *Meeker*, U.S. Patent No. 7,163,265 B2 to Adachi ("*Adachi*"), and/or the *Boulevard 70 CS* renders obvious claims 1-3, 5-7, and 16.

**b. '504 Patent**

**i. *Meeker***

As explained in the chart in Exhibit B1, the Asserted Claims of the '504 patent are rendered unpatentable under 35 U.S.C. §§ 102 and/or 103, depending upon the claim construction adopted in this case, by *Meeker* alone, or in combination with one or more other prior art references, as further identified below.

**'074 Patent - Claims 1-15**

- *Meeker* anticipates and/or renders obvious claims 1-15.
- *Meeker* in combination with *Yamazaki*, *Washimi*, *Wetter*, the *Uppa Baby Mesa*, the *B-Safe 35*, *Williams*, and/or the *Graco Smart Seat* renders obvious claims 1-15.

**ii. *Takahashi***

As explained in the chart in Exhibit B2, the Asserted Claims of the '504 patent are rendered unpatentable under 35 U.S.C. §§ 102 and/or 103, depending upon the claim construction adopted in this case, by *Takahashi* alone, or in combination with one or more other prior art references, as further identified below.

**'074 Patent - Claims 1-15**

- *Takahashi* anticipates and/or renders obvious claims 1-15.
- *Takahashi* in combination with *Yamazaki*, *Washimi*, or *Wetter* renders obvious claims 1-15.

**iii. *Boulevard 70 CS***

As explained in the chart in Exhibit B3, the Asserted Claims of the '504 patent are rendered unpatentable under 35 U.S.C. §§ 102 and/or 103, depending upon the claim construction adopted in this case, by *Boulevard 70 CS* alone, or in combination with one or more other prior art references, as further identified below.

**'074 Patent - Claims 1-15**

- *Boulevard 70 CS* anticipates and/or renders obvious claims 1-15.



- *Boulevard 70 CS* in combination with *Yamazaki*, *Washimi*, or *Wetter*, the *Uppa Baby Mesa*, the *B-Safe 35*, *Williams*, and/or the *Graco Smart Seat* renders obvious claims 1-15.

**iv. Yamazaki**

As explained in the chart in Exhibit B4, the Asserted Claims of the '504 patent are rendered unpatentable under 35 U.S.C. § 103, depending upon the claim construction adopted in this case, by *Yamazaki* alone, or in combination with one or more other prior art references, as further identified below.

'074 Patent - Claims 1-15

- *Yamazaki* renders obvious claims 1-15.
- *Yamazaki* in combination with *Meeker*, *Adachi*, and/or the *Boulevard 70 CS* renders obvious claims 1-15.

To the extent that a finder of fact finds that a limitation of any of the Asserted Claims was not disclosed by one of the references identified above, that claim is nevertheless unpatentable as obvious because the Asserted Claims contain nothing that constitutes patentable innovation. To the extent not anticipated, the Asserted Claims amount to nothing more than the combination of familiar elements according to known methods to achieve predictable results and do no more than choose between clear alternatives known to those of ordinary skill in the art.

One of ordinary skill in the art would have been motivated to combine the references disclosed above and in the attached charts, as each combination of art would have no unexpected results, and at most would simply represent a known alternative to one of ordinary skill in the art. *See KSR*, 127 S. Ct. at 1739-40 (rejecting the Federal Circuit's "rigid" application of the teaching, suggestion, or motivation to combine test, instead espousing an "expansive and flexible" approach). Indeed, the Supreme Court held that a person of ordinary skill in the art is "a person of ordinary creativity, not an automaton" and "in many cases a person of ordinary skill in the art will be able to fit the teachings of multiple patents together like pieces of a puzzle." *Id.* at

1742. Nevertheless, in addition to the information contained in the section above and elsewhere in these contentions, Defendants hereby identify additional motivations and reasons to combine the cited art.

The prior art references identified herein would have been combined using: known methods to yield predictable results; known techniques in the same way; a simple substitution of one known, equivalent element for another to obtain predictable results; and/or a teaching, suggestion, or motivation in the prior art generally. In addition, it would have been obvious to try combining the prior art references identified above because there were only a finite number of predictable solutions and/or because known work in one field of endeavor prompts variations based on predictable design incentives and/or market forces either in the same field or a different one. In addition, the combinations of the prior art references identified above would have been obvious because the combinations represent the known potential options with a reasonable expectation of success.

One of ordinary skill in the art would have been motivated, or had reason, to combine the prior art references identified above for at least the reason that they present interrelated teachings; they disclose the effects of demands known to the design community or present in the marketplace; they disclose the existence of a known problem for which there was an obvious solution; they disclose the existence of a known need or problem in the field of endeavor at the time of the invention; and the background knowledge that would have been possessed by a person having ordinary skill in the art. For example, the prior art references are generally directed to solving the same problems relating to control of carbon deposits on fuel injectors, improving engine efficiency, etc. Thus, a skilled artisan seeking to solve these problems would look to these cited references in combination.

The motivation or reason to combine the teachings of the prior art references disclosed herein is found in the references themselves and in: (1) the nature of the problems being solved; (2) the express, implied, and inherent teachings of the prior art; (3) the knowledge of persons of ordinary skill in the art; (4) the fact that the prior art is generally directed towards the same problems; and/or (5) the predictable results obtained in combining the different elements of the prior art.

Numerous prior art references, including those identified in these Invalidity Contentions and the attached Exhibits, reflect common knowledge and the state of the prior art before the earliest claimed priority date of the corresponding Asserted Patents. For at least the reasons described throughout these Invalidity Contentions, it would have been obvious to one of ordinary skill in the art to combine any of a number of prior art references, including any combination of those identified in the attached Exhibits to meet the limitations of the Asserted Claims. As such, Defendants inclusion of exemplary combinations, in view of the factors and motivations identified in the preceding paragraphs, does not preclude Defendants from identifying other invalidating combinations as appropriate.

The claim charts in Exhibits A1-A4 and B1-B4 identify where in each of the charted prior art references the limitations of the Asserted Claims of the Asserted Patents are found. Defendants do not take any particular claim construction position on any of these limitations at this time and reserve the right to argue for specific claim constructions at the appropriate time. To the extent some limitations may be governed by 35 U.S.C. §112 ¶ 6, Defendants take no position in these Invalidity Contentions as to whether these limitations should properly be construed under 35 U.S.C. §112 ¶ 6. However, the accompanying charts nevertheless provide exemplary structure(s) and act(s) that perform the claimed functions or steps as disclosed in the

item of prior art. Defendants reserve the right to amend these contentions based upon any constructions of the claims as determined by the Court that clarify or identify specific limitations governed by 35 U.S.C. § 112 ¶ 6.

Defendants have endeavored to cite to the most relevant portions of the identified prior art. However, other portions of the identified prior art may additionally disclose, either expressly or inherently, one or more elements or limitations of the Asserted Claims. In an effort to focus the issues, Defendants identify only exemplary portions of the identified prior art. To the extent it is found a charted reference does not expressly disclose certain claim limitations, Defendants contend that such limitations are inherent. Defendants reserve the right to rely on uncited portions of the identified prior art to establish the invalidity of the Asserted Claims. Moreover, Defendants reserve the right to rely on uncited portions of the identified prior art, rely on other references (irrespective of whether such references themselves qualify as prior art) to show the state of the art, and/or to rely on expert testimony to provide context to, or aid in, understanding the cited portions of the identified prior art.

Where Defendants cite to a particular drawing or figure in the attached claim charts, the citation encompasses the description of the drawing or figure, as well as any text associated with the drawing or figure. Similarly, where Defendants cite to particular text concerning a drawing or figure, the citation encompasses that drawing or figure as well.

Relatedly, it is often the case that certain portions of patent disclosures build upon other disclosures—even if they are referred to as a separate or alternative embodiment. Thus, Defendants' citations to structures or functions incorporate by reference all disclosures to related structures or functions, including any additional detail provided as to the operation or design of those structures or functions. Further, citations in each dependent claim include citations to each

claim from which it directly or indirectly depends. In addition, citations as to any recited limitation, step, or component in the claims apply wherever each such limitation, step, or component is repeatedly recited elsewhere in the claim

#### **4. Invalidity Under 35 U.S.C. § 102(g)<sup>4</sup>**

Each prior art patent, publication, or product identified above was either effectively filed or issued (for patents), published (for publications) or known, used, offered for sale or sold (for products) before the earliest claimed priority date of the Asserted Patent to which it is applied for invalidity, and none appears to have been abandoned, suppressed, or concealed, so each such reference also constitutes evidence of prior invention pursuant to 35 U.S.C. § 102(g) to the extent that it is in the U.S. The persons or entities involved with each such invention include the named inventors on the identified patents, the authors listed on the identified publications, and the entities and individuals identified in connection with the identified products. Investigation, analysis, and discovery are ongoing in this matter, and Defendants reserve the right to supplement this response as appropriate.

#### **5. Prosecution History Estoppel**

The '074 patent was filed on October 25, 2013, and a Requirement for Restriction/Election was filed on June 2, 2015, requiring election between two patentably distinct species: "Figures 1-8A; and Figures 9-15." '074 Restriction Requirement, p. 1-2. The Applicant elected "without traverse, to prosecute Species II (Figures 9 - 15), which corresponds to all Claims 1-20." '074 Response to Restriction Requirement, p. 1. Following the election, the '074

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<sup>4</sup> To the extent that Britax argues that the asserted patents are entitled to a priority date or effective filing date prior to March 16, 2013, pre-AIA 35 U.S.C. §102(g) may apply. *See MPEP* 2159.03 (pre-AIA statutes apply to the extent that a patent "(1) contains or contained at any time a claimed invention having an effective filing date as defined in 35 U.S.C. 100(i) that occurs before March 16, 2013; or (2) is ever designated as a continuation, divisional or continuation-in-part of an application that contains or contained at any time such a claim").

patent received a Notice of Allowance on October 7, 2016, and an Issue Notification on November 2, 2016. '074 Notice of Allowance, p. 1; '074 Issue Notification, p. 1.

The '504 patent was filed on October 14, 2016, and on November 16, 2016, the Examiner issued a Requirement for Restriction/Election because “[c]laim(s) 14 appears to be generic to the following disclosed patentably distinct species: I. Figures 1-8A; and II. Figures 9-15.” '504 Restriction Requirement, p. 2. The Examiner further stated that “[t]he species are independent or distinct because as disclosed the different species have mutually exclusive characteristics for each identified species [and that] these species are not obvious variants of each other based on the current record.” *Id.* As a result, the Examiner required Britax “under 35 U.S.C. 121 to elect a single disclosed species, or a single grouping of patentably indistinct species, for prosecution on the merits to which the claims shall be restricted if no generic claim is finally held to be allowable.” *Id.*

On November 23, 2016, in its response, Britax elected, “without traverse, to prosecute Species I, FIGS. 1 - 8A (which correlates to claims 1 - 20).” '504 Response to Restriction Requirement, p. 1. Following the election, the '504 patent received a Notice of Allowance on January 25, 2017 and an Issue Notification on February 15, 2017. '504 Notice of Allowance, p. 1; '504 Issue Notification, p. 1.

A restriction requirement arises during examination at the PTO when an applicant pursues what are determined to be multiple patentably distinct inventions in the same application. 35 U.S.C. § 121. The examiner “may require the applicant in the reply to that action to elect a species of his or her invention to which his or her claim will be restricted if no claim to the genus is found to be allowable.” 37 C.F.R. § 1.146. When a patentee disavows a certain meaning to obtain a patent, the doctrine of prosecution history estoppel narrows the meaning of

the claim consistent with the scope of the claim surrendered. *Phillips v. AWH Corp.*, 415 F.3d 1303, 1317 (Fed. Cir. 2005). Britax's affirmative statement of electing Figures 1-8A without traverse thus narrows the meanings of the claims of the '504 patent.

Once an applicant has selected a species, the policy of the Office "is that applicants are not permitted to shift to claim another invention after an election is made and an Office action on the merits is made on the elected invention." MPEP § 819. Although the Examiner identified a shift in the elected species in the Notice of Allowance, '504 Notice of Allowance, p. 1, the shift was neither timely nor appropriate. Thus, prosecution history estoppel applies to prohibit Britax from obtaining claim scope in the '504 patent outside of expressly elected Species I, Figures 1-8A. *See* '504 Response to Restriction Requirement, p. 1.

#### **6. Equitable Misconduct**

Equitable misconduct must "be applied in instances where the patentee's misconduct resulted in the unfair benefit of receiving an unwarranted claim." *Therasense v. Becston, Dickinson, and Co.*, 649 F.3d 1276, 1292 (Fed. Cir. 2011). Discovery in this case is in its early stages and ongoing, and Defendants are investigating inequitable misconduct as it relates to the '504 and '074 patents. To the extent evidence of inequitable conduct comes to light during discovery, Defendants reserve the right to amend these Invalidity Contentions accordingly.

#### **IV. Invalidity Under 35 U.S.C. § 112**

In addition to being invalid in view of the prior art cited above, the Asserted Claims are invalid for the reasons explained below.

To satisfy the written description requirement under the first paragraph of 35 U.S.C. § 112, "the description must clearly allow persons of ordinary skill in the art to recognize that the inventor invented what is claimed." *Ariad Pharms., Inc. v. Eli Lilly and Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (*en banc*) (internal quotation marks omitted). "In other words, the test for

sufficiency is whether the disclosure of the application relied upon reasonably conveys to those skilled in the art that the inventor had possession of the claimed subject matter as of the filing date.” *Id.*

Further, under the first paragraph of 35 U.S.C. § 112, an enabling disclosure “must teach those skilled in the art how to make and use the *full scope* of the claimed invention without undue experimentation.” *In re Wright*, 999 F.2d 1557, 1561 (Fed. Cir. 1993) (emphasis added). To satisfy the statutory bargain underlying § 112, the scope of the claims must be “commensurate” with teachings in the specification. *Enzo Biochem, Inc. v. Calgene, Inc.*, 188 F.3d 1362, 1377 (Fed. Cir. 1999). “The scope of the claims must be less than or equal to the scope of the enablement.” *Nat’l Recovery Techs., Inc. v. Magnetic Separation Sys., Inc.*, 166 F.3d 1190, 1196 (Fed. Cir. 1999).

“[A]n enablement determination is made *retrospectively*, *i.e.*, by looking back to the filing date of the patent application and determining whether undue experimentation *would have been* required to make and use the claimed invention at the time.” *Enzo Biochem*, 188 F.3d at 1371-72 (emphasis in original). An essential question is “whether the scope of enablement of [a claim] is as broad as the scope of the claim.” *Amgen, Inc. v. Chugai Pharm. Co.*, 927 F.2d 1200, 1212 (Fed. Cir. 1991). Thus, a claim is vulnerable to an attack for lack of an enabling disclosure where the patent “fails to teach those in the art to make and use the invention as broadly as it is claimed without undue experimentation.” *In re Cortright*, 165 F.3d 1353, 1356 (Fed. Cir. 1999).

The need to engage in “an iterative, trial-and-error process to practice the claimed invention,” where the specification provides “only a starting point, a direction for further research,” precludes a finding of enablement. *ALZA Corp. v. Andrzej Pharm., LLC*, 603 F.3d 935, 940 (Fed. Cir. 2010). Similarly, where the skilled artisan “would need to assay each of at least



tens of thousands of candidates” and the specification offered “no guidance or predictions about particular substitutions” that would lead to other effective members, genus claims are not enabled based on undue experimentation. *Wyeth & Cordis Corp. v. Abbott Labs.*, 720 F.3d 1390, 1385-86 (Fed. Cir. 2013).

In *In re Wands*, 858 F.2d 731, 737 (Fed. Cir. 1988), the Federal Circuit identified eight factors a court may consider when evaluating whether a disclosure would require undue experimentation and therefore is not enabling, including: the nature of the invention; the breadth of the claims; the amount of direction or guidance presented; the presence or absence of working examples; the state of the prior art; the predictability or unpredictability of the art; the relative skill of those in the art; and quantity of experimentation necessary.

Further under 35 U.S.C. § 112, certain of the Asserted Claims are insolubly ambiguous because they do not have a meaning that can be clearly and definitely determined from the Asserted Patents. For each term listed below, the ’504 patent does not clearly support, and/or provide antecedent basis for the term, such that the terms and phrases used by the applicant do not define the invention with a reasonable degree of clarity and precision, and the meaning of each term is not readily discernible to a person of ordinary skill in the art.

Moreover, paragraph two of 35 U.S.C. § 112 requires “that a patent’s claims, viewed in light of the specification and prosecution history, inform those skilled in the art about the scope of the invention with reasonable certainty.” *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120, 2129 (2014). “[A] patent must be precise enough to afford clear notice of what is claimed, thereby ‘appris[ing] the public of what is still open to them.’” *Id.* (citations omitted). In other words, a claim “must be sufficiently definite to inform the public of the bounds of the protected invention, i.e., what subject matter is covered by the exclusive rights of the patent.” *Ancora*

*Techs., Inc. v. Apple, Inc.*, 744 F.3d 732, 737 (Fed. Cir. 2014) (quoting *Halliburton Energy Servs., Inc. v. M-I LLC*, 514 F.3d 1244, 1249 (Fed. Cir. 2008)).

While an inventor may define specific terms to describe an invention, such defining must be done with clarity, deliberateness, and precision. *See Merck & Co., Inc., v. Teva Pharms. USA, Inc.*, 395 F.3d 1364, 1370 (Fed. Cir. 2005); *In re Paulsen* 30 F.3d 1475, 1480 (Fed. Cir. 1994) (quoting *Intellicall, Inc. v. Phonometrics, Inc.*, 952 F.2d 1384, 1387-88 (Fed. Cir. 1992)) (holding that an inventor may define specific terms used to describe an invention, but must do so “with reasonable clarity, deliberateness, and precision” and must “‘set out his uncommon definition in some manner within the patent disclosure’ so as to give one of ordinary skill in the art notice of the change” in meaning (citation omitted)).

The Asserted Claims are invalid for failure to satisfy the written description requirement under 35 U.S.C. § 112, because the specifications for the Asserted Patents do not show that the inventors had possession of the claimed inventions as of the filing date of the Asserted Claims. The Asserted Claims also are invalid as indefinite under 35 U.S.C. § 112, because they fail to particularly point out and distinctly claim the subject matter that the applicant regards as his inventions. Subject to Defendants’ reservation of rights in these Invalidity Contentions, the Asserted Claims are invalid for failure to meet the requirements of § 112, as explained below.

#### **1. The ’504 Patent - Invalidity Under 35 U.S.C. § 112**

In view of the claim terms identified below, the asserted claims of the ’504 patent are invalid under paragraphs one and two of 35 U.S.C. § 112, because they fail to comply with the enablement requirement, fail to particularly point out and distinctly claim the subject matter that the applicants regard as their invention, and/or are insolubly ambiguous because they do not have a meaning that can be clearly and definitely determined from the ’504 patent.

- (a) **“forwardly and upwardly” / “forwardly from the backrest portion and upwardly from the seat portion” (claims 1, 5, 9, 13);**
- (b) **“generally at an intersection of the seat and backrest portions” (claims 1, 5, 9, 13);**
- (c) **“generally at a middle of the seat portion in a forward and rearward direction” (claims 1, 5, 9, 13);**
- (d) **“a first lateral edge surface and a second lateral edge surface” / “first and second lateral edge surfaces” (claims 1, 9, 10);**
- (e) **“extending along respective sides of the tensioning mechanism from and transverse to the axis” (claims 1, 5, 9);**
- (f) **“at least partly displaced” (claims 1, 5);**
- (g) **“secure the child seat to the vehicle seat” (claims 1, 6, 9, 10, 13);**
- (h) **“the first and second lateral edge surfaces of respective different portions of the tensioning mechanism” (claim 1);**
- (i) **“first and second edge surfaces” (claim 4);**
- (j) **“first and second lateral edges” (claims 1, 5, 13)**
- (k) **“a first rigid edge surface and a second rigid edge surface” / “first and second rigid edge surfaces” (claims 5, 6);**
- (l) **“substantially adjacent to the seat base” (claims 1, 5, 9, 13);**
- (m) **“lap section” / “shoulder section” (claims 5, 6)**
- (n) **“opposing side portions” (claim 9);**
- (o) **“engaging surface” (claim 9);**
- (p) **“tensioned configuration” (claim 9);**
- (q) **“pivot structure” (claim 13);**
- (r) **“a first lateral edge surface and a second lateral edge surface” / “first and second lateral edge surfaces” (claims 1, 9, 10);**
- (s) **“first pivot portion” / “second pivot portion” (claim 13);**
- (t) **“third and fourth lateral edges” (claim 13);**

- (u) **“first and second lateral edges that protrude forwardly and upwardly . . . third and fourth lateral edges that protrude forwardly and upwardly” (claim 13);**
- (v) **“first lateral edge member and a second lateral edge member” / “first and second lateral edge members” (claim 13);**
- (w) **“third and fourth lateral edge members” (claim 13);**
- (x) **“proximate to the second belt path” / “proximate to the first belt path” (claim 13);**
- (y) **“proximate to the seat portion” (claim 13);**
- (z) **“third position” / “fourth position” (claim 13)**

## **2. The '074 Patent - Invalidity Under 35 U.S.C. § 112**

In view of the claim terms identified below, the asserted claims of the '074 patent are invalid under paragraphs one and two of 35 U.S.C. § 112, because they fail to comply with the enablement requirement, fail to particularly point out and distinctly claim the subject matter that the applicants regard as their invention, and are insolubly ambiguous because they do not have a meaning that can be clearly and definitely determined from the '074 patent.

- (a) **“untensioned state” (claims 1, 16) / “untensioned configuration” (claims 7, 16);**
- (b) **“forwardly and upwardly” (claims 1, 16);**
- (c) **“downwardly and forwardly” (claims 1, 16);**
- (d) **“upwardly and rearwardly” (claims 1, 16);**
- (e) **“first and second lateral edges” (claims 1, 16);**
- (a) **“first and second edges” (claims 1, 3, 5, and 16);**
- (b) **“proximal end” / “distal end” (claims 1, 16)**
- (c) **“substantially adjacent to the seat base” (claims 1, 16);**
- (d) **“sitting surface” (claims 1, 16);**
- (e) **“first belt path spanning the first and second edges” (claim 3);**

**(f) “proximate an intermediate region of the seat portion” (claim 6) /  
“proximate an intersection of the backrest portion and the seat  
portion” (claim 7)**

Defendants expressly reserve the right to revise, amend, and/or supplement these contentions, based on newly discovered information produced during discovery and/or based on claim constructions determined by the Court.

Respectfully submitted,

Dated: July 24, 2019

By: /s/ Gary Ma

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of July, 2019, I delivered a true copy of the foregoing by electronic mail to the following:

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*Attorneys for Plaintiff Britax Child Safety, Inc.*

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Based upon Plaintiff's Amended Complaint, and Disclosure of Asserted Claims and Infringement Contentions and claim charts, and the apparent claim constructions and applications of the claims to Defendants accused products and/or components, as best as they can be deciphered, the reference charted below anticipates or at least renders obvious the asserted claims. These invalidity contentions are not an admission by Defendants that the accused products or components, including any current or past version of these products or components, are covered by, or infringe the asserted claims, particularly when these claims are properly construed and applied. These invalidity assertions are also not an admission that Defendants concede or acquiesce to any claim construction(s) implied or suggested by Plaintiff in its Amended Complaint or the Disclosure of Asserted Claims and Infringement Contentions and claim charts. Nor are Defendants asserting any claim construction positions through these charts, including whether the preamble is a limitation. The portions of the prior art reference cited below are not exhaustive but are exemplary in nature.

The chart below discloses how prior art references identified by Defendants discloses, either expressly or inherently, and/or render obvious each of the asserted claims. The citations provided are exemplary and do not necessarily include each and every disclosure of the limitation in the references. Defendants have endeavored to cite to the most relevant portions of the identified prior art, but other portions of the identified prior art may additionally disclose, either expressly or inherently, and/or render obvious one or more limitations of the asserted claims. Thus, Defendants reserve the right to rely on: (1) uncited portions of the identified prior art; (2) other prior art not identified herein; (3) references that show the state of the art (irrespective of whether such references themselves qualify as prior art to the asserted patents); (4) factual testimony from the inventors or authors of the prior art references, or purveyors of prior art devices; and/or (5) expert testimony, to provide context to or aid in understanding the prior art and the state of the art at the time of the alleged inventions.

The lack of a citation for an element should not be deemed an admission that the element is not disclosed or is not inherent in the reference. When the chart indicates a particular reference discloses or embodies a limitation, the terms "discloses," "disclosed," "embodies," and "embodied" refer to explicit and/or inherent disclosure and/or obvious variations of the actual disclosure. Further, due to the insoluble ambiguity of certain claims and claim limitations, Defendant has, in some instances, used its best efforts to reasonably interpret the claims to fulfill their duties in charting the prior art references.

Where Defendants cite to a particular drawing or figure in the accompanying charts, the citation encompasses the description of the drawing or figure, as well as any text associated with the drawing or figure. Similarly, where Defendants cite to particular text concerning a drawing or figure, the citation encompasses that drawing or figure as well. Certain identified prior art inherently discloses features of the asserted claims. Defendants reserve the right to rely on inherency to demonstrate the invalidity of the asserted claims. Moreover, certain prior art references may inherently disclose certain features of the asserted claims as construed by Plaintiff. Defendants may rely on cited or uncited portions of the prior art, other documents, factual testimony, and expert testimony to establish the inherency of certain features of the prior art to invalidate the asserted claims.

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Defendants contend that one of ordinary skill in the art at the time of the purported invention would have been motivated to combine one or more of the identified references together. In general, a motivation to combine any of the identified references with others exists within the references themselves, as well as within the knowledge of those of ordinary skill in the art. These references identify and address the same technical issues and suggest similar solutions to those issues. Additionally, a person of ordinary skill in the art at the time of the purported invention would have been motivated to combine the prior art references identified by (i) his or her education and experience, (ii) the state of the prior art as a whole, (iii) the nature of the problem to be solved, (iv) common knowledge in the art, (v) common sense, (vi) design incentives, (vii) market forces, and/or (viii) a desire to tailor a solution using all of the skills and knowledge at his or her disposal. *See, e.g., KSR Int'l Co. v. Teleflex, Inc.*, 127 S. Ct. 1727 (2007); *Examination Guidelines for Determining Obviousness Under 35 U.S.C. §103 in View of the Supreme Court Decision in KSR Int'l v. Teleflex, Inc.*, Fed. Reg. 57526 (Oct. 10, 2007).

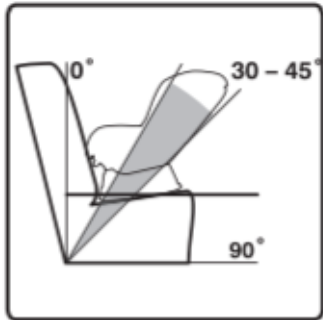


**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

The following list illustrates the grounds for invalidity:

- Britax Child Safety, Inc., *Britax Boulevard 70 CS User Guide*, (2011) [https://us.britax.com/media/7420/p473100\\_r1\\_blvd\\_cs\\_us\\_web.pdf](https://us.britax.com/media/7420/p473100_r1_blvd_cs_us_web.pdf), *Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs*, YouTube (Jan. 6, 2011) <https://www.youtube.com/watch?v=OrL4oZaEwuk>, *Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs*, YouTube (Jan. 6, 2011), <https://www.youtube.com/watch?v=IlgD5S-9NFE&t=59s>, (collectively, “*Boulevard 70 CS*”) anticipates claims 1-3, 5-7, and 16.
- Boulevard 70 CS renders obvious claims 1-3, 5-7, and 16.
- Boulevard 70 CS in combination with U.S. Patent No. 6,508,510 B2 (“*Yamazaki*”), Japanese Laid-open Patent Publication No. H5-185869 (“*Washimi*”), European Patent Application No. EP0822115A2 (“*Wetter*”), the Uppa Baby Mesa Instruction Manual (“*Uppa Baby Mesa*”), the Britax B-Safe 35 User Guide (“*B-Safe 35*”) U.S. Patent No. 8,322,788 B2 (“*Williams*”) and/or the Graco Smart Seat Owner’s Manual (“*Graco Smart Seat*”) renders obvious claims 1-3, 5-7, and 16.

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
[1(p)] A child seat configured to be secured to a vehicle seat in both a rear-facing and front-facing orientation, the child seat comprising:	<p><i>Boulevard 70 CS</i> discloses or renders obvious a child seat configured to be secured to a vehicle seat in both a rear-facing and front-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 15; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p>  <p><i>Id.</i>, p. 15.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**


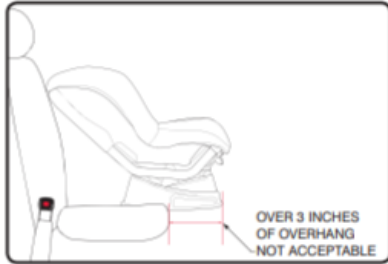

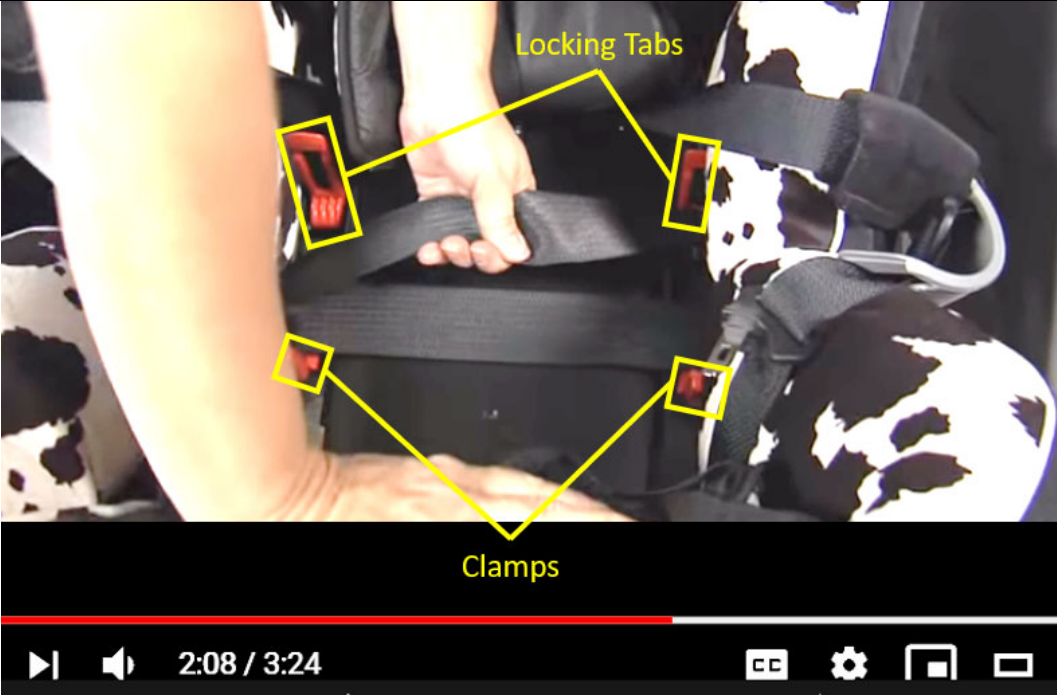

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	<p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>UP TO 3 INCHES OF OVERHANG ACCEPTABLE</p> <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p>OVER 3 INCHES OF OVERHANG NOT ACCEPTABLE</p> <p><i>Unacceptable overhang</i></p> </div> </div> <div style="text-align: right; margin-top: 10px;">  </div> <p style="text-align: right;"><i>Id.</i>, p. 15.</p>

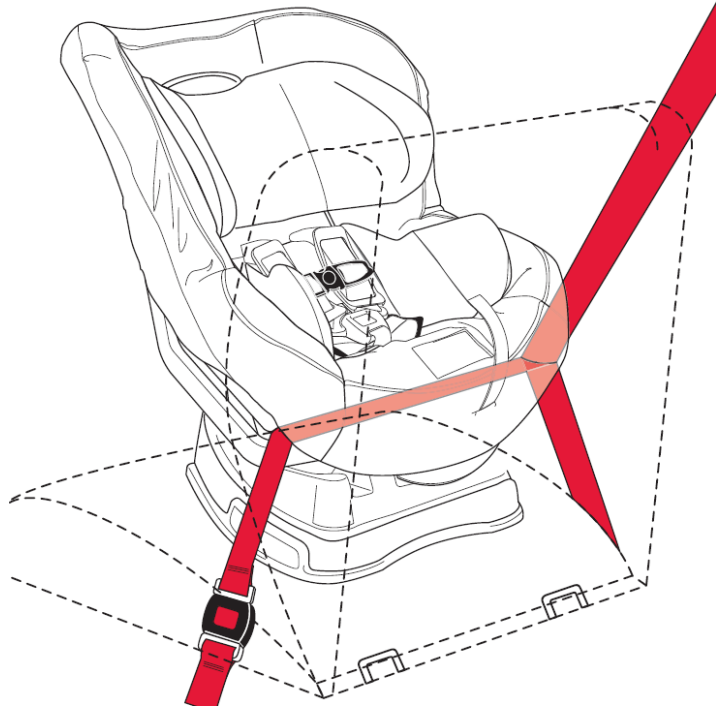
Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div><p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p></div>

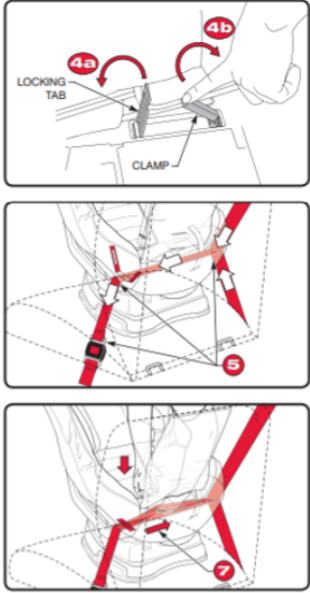
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation in claim 1.</p>
[1(a)(1)] a seat base defining a seat portion, a backrest portion, and first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions,	<p><i>Boulevard 70 CS</i> discloses or renders obvious a seat base defining a seat portion, a backrest portion, and first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions. <i>Boulevard 70 CS User Guide</i>, p. 22.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**


<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	 <p><i>Id.</i>, p. 22.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation in claim 1.</p>
[1(a)(2)] wherein the seat base is configured to receive a belt of the vehicle seat in an	<p><i>Boulevard 70 CS</i> discloses or renders obvious the seat base is configured to receive a belt of the vehicle seat in an untensioned state to secure the child seat to the vehicle seat in an untensioned configuration. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
<p>untensioned state to secure the child seat to the vehicle seat in an untensioned configuration; and</p>	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>  <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>

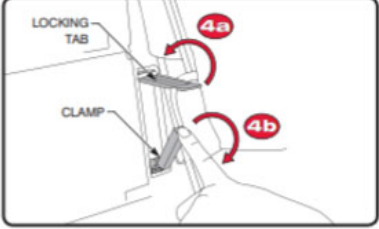
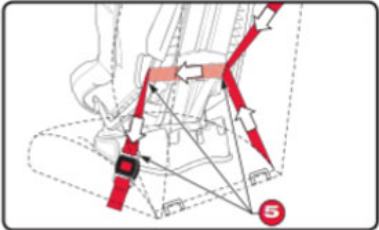

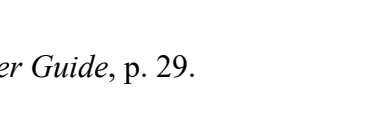



**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

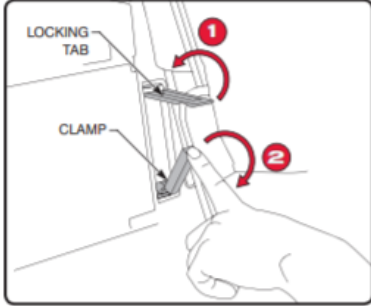
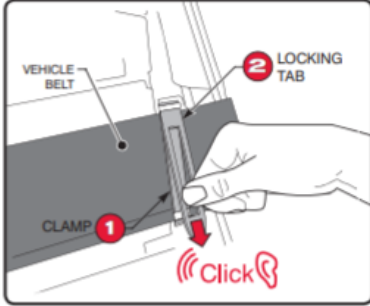
<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation in claim 1.</p>
[1(b)(1)] a tensioning mechanism having a proximal end pivotally attached to the backrest portion of the seat base and a distal end comprising a sitting surface for an occupant of	<p><i>Boulevard 70 CS</i> discloses or renders obvious a tensioning mechanism having a proximal end pivotally attached to the backrest portion of the seat base and a distal end comprising a sitting surface for an occupant of the child seat and an engaging surface facing opposite to the sitting surface. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>



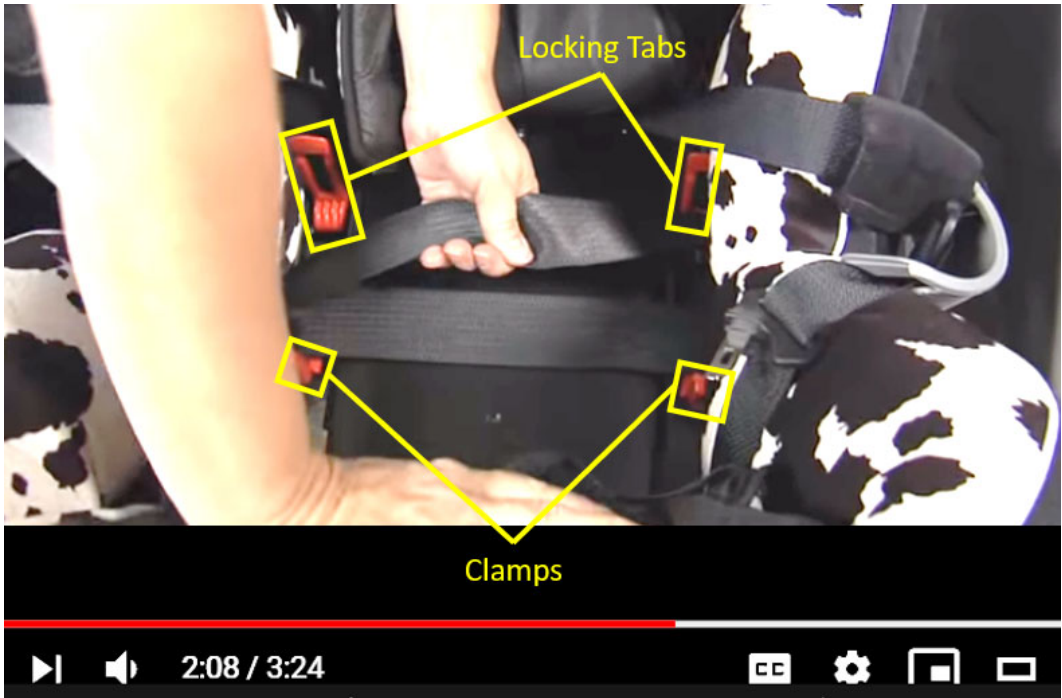
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
the child seat and an engaging surface facing opposite to the sitting surface,	<p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>     

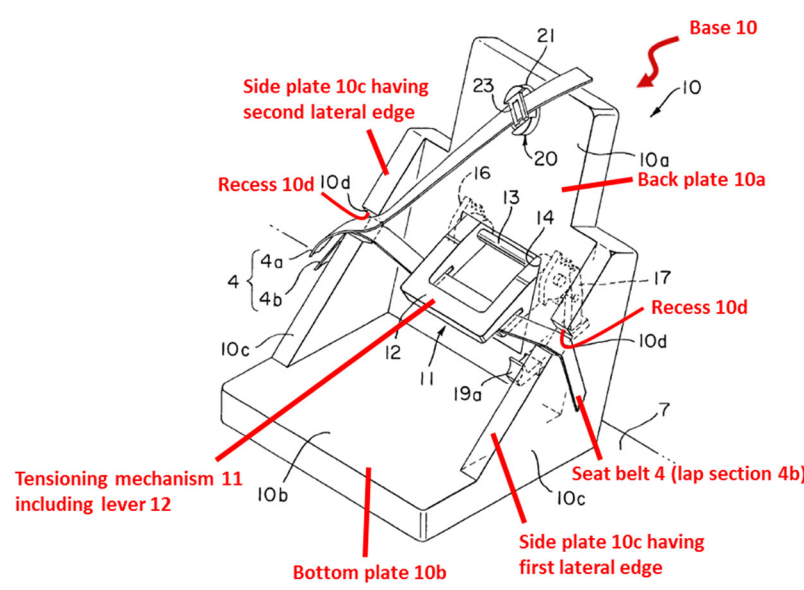
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>

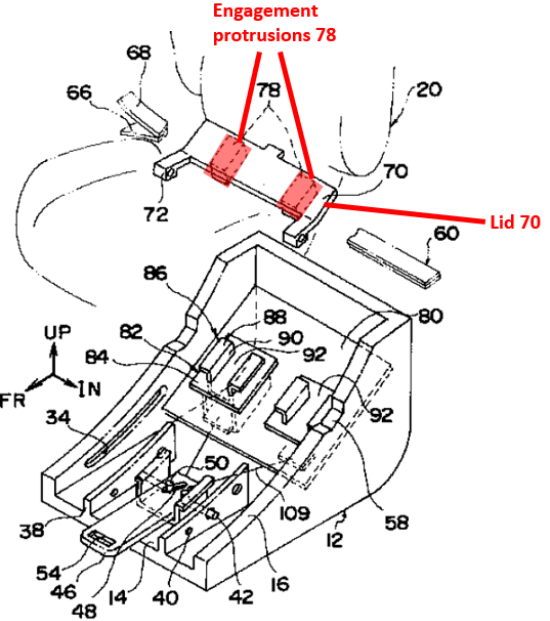
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>’s tensioning mechanism. Furthermore, although <i>Yamazaki</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Yamazaki</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Yamazaki</i> discloses:</p>

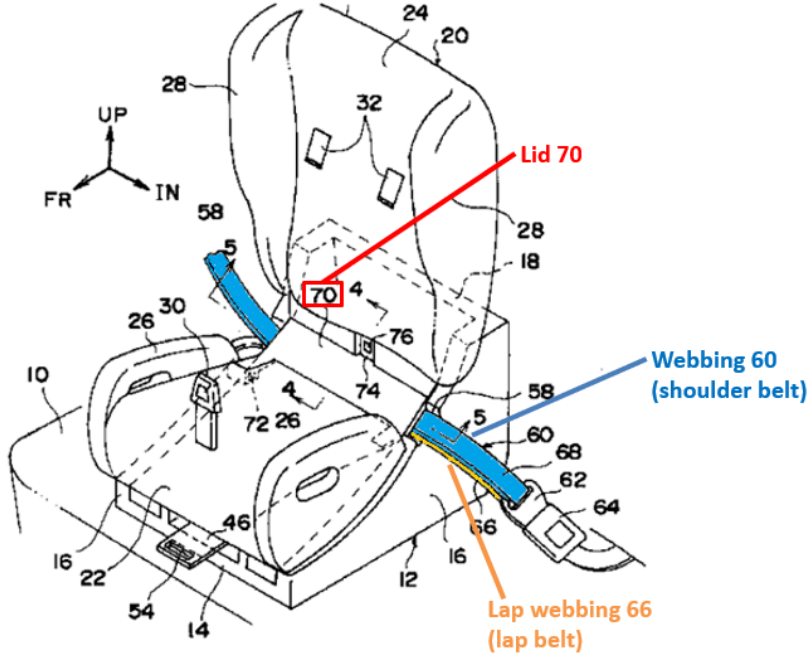
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

	Invalidity Chart for U.S. Patent No. 9,499,074
Claim Language	Prior Art
	<p>“The base 10 is fastened to the passenger seat 7 by a lap-and-diagonal seat belt 4. The seat belt 4 has a diagonal section 4a extending between a tongue plate 5 (FIG. 5) to be engaged with a latch 6 (FIG. 5) connected to the floor of the vehicle and a retractor (not shown), and a lap section 4b extending between the tongue plate 5 (FIG. 5) and an anchor (fixed member) 9 (FIG. 5).” <i>Yamazaki</i>, 3:30-36.</p> <p>“Step 1: The base 10 is set on the passenger seat 7 of the vehicle. Step 2: The tongue plate 5 of the seat belt 4 is engaged with the latch 6 with the lap section 4b of the seat belt 4 extended under the lever 12 of the seat belt tightening mechanism 11.” <i>Id.</i>, 4:27-32.</p>  <p style="text-align: center;"><b>FIG. 1</b> <i>Id.</i>, Fig. 1.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p>In another alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Washimi</i>’s tensioning mechanism. Furthermore, although <i>Washimi</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Washimi</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Washimi</i> discloses:</p> <p>“In the straddle part 56, the webbing 60 is positioned with the lap webbing 66 and shoulder webbing 68 stacked together in a state where the tongue plate 62 is engaged with the buckle device 64.” <i>Washimi</i>, ¶[0023].</p>  <p><i>Id.</i>, Fig. 1 (annotated).</p>

## Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

Claim Language	Invalidity Chart for U.S. Patent No. 9,499,074
Claim Language	Prior Art
	 <p data-bbox="1102 1084 1390 1120"><i>Id.</i>, Fig. 2 (annotated).</p> <p data-bbox="575 1159 1902 1341">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Wetter</i>’s tensioning mechanism. Furthermore, although <i>Wetter</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Wetter</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Wetter</i> discloses:</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

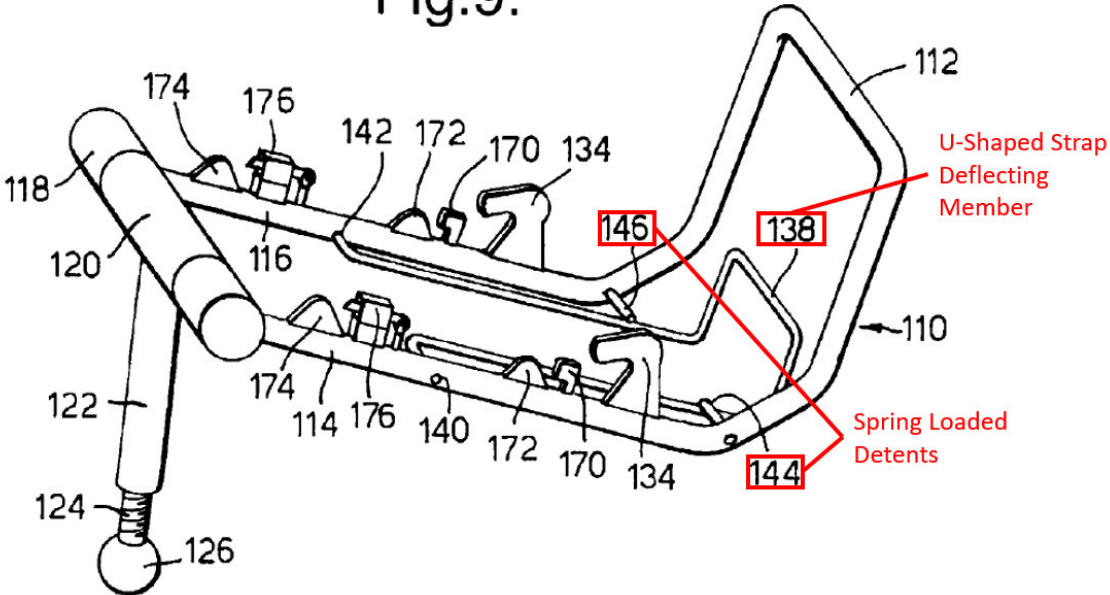
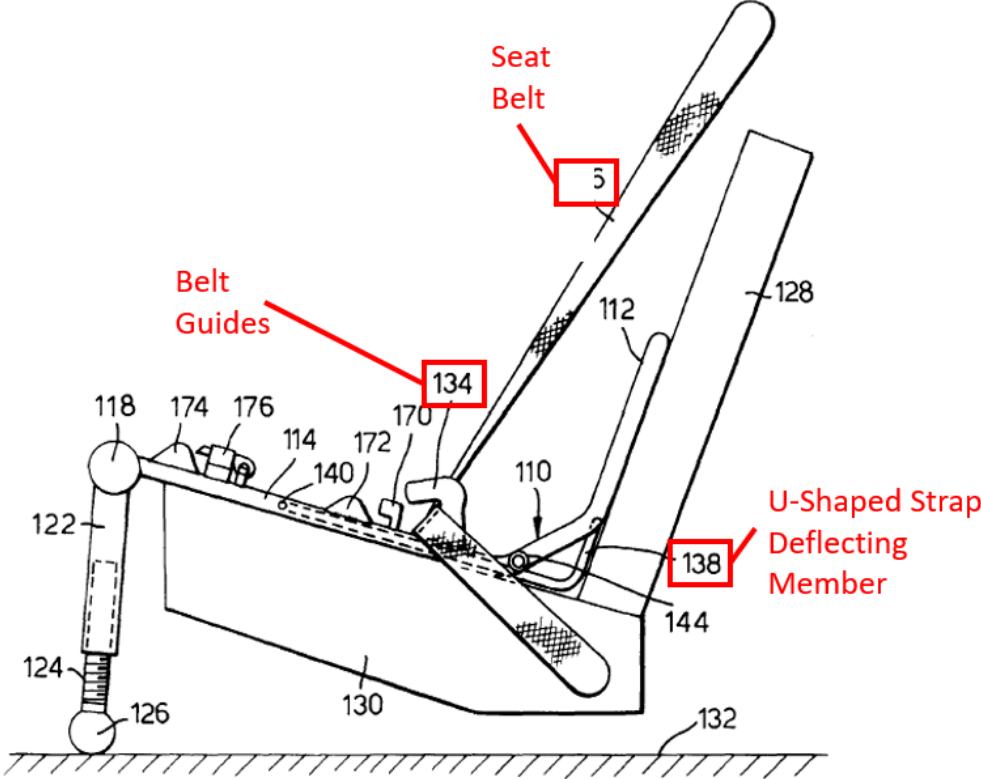
Claim Language	Invalidity Chart for U.S. Patent No. 9,499,074
	<p data-bbox="667 337 1900 738"> <b>Prior Art</b>            “During installation, both the lap and shoulder portions of an adult seat belt 136 for the vehicle seat 128, 130 are engaged round the belt guides 134 as shown in Figure 10. Next, a U-shaped strap deflecting member 138, which has its ends pivotally engaging in holes 140 and 142 in the side limbs 114 and 116 of the base member, is pivoted downwardly from the position shown in Figure 10 to the position shown in Figure 11 in which it deflects the adult seat belt 136 downwardly between the belt guides 134, thereby tightening the belt 136 and compressing the springs of the seat cushion 130 of the vehicle seat. The deflection member 138 is held in the position shown in Figures 9 and 11 (in which it lies substantially parallel to the limbs 114 and 116 of the base member) by springloaded detents 144 and 146 on the base member 110 adjacent to the junctions between the central portion 112 and the end portions 114 and 116 respectively.”  <i>Wetter</i>, 5:6-23.         </p> <p data-bbox="1066 803 1213 868" style="text-align: center;"> <b>Fig.9.</b> </p>  <p data-bbox="1627 966 1801 1063"> <i>U-Shaped Strap Deflecting Member</i> </p> <p data-bbox="1543 1242 1701 1307"> <i>Spring Loaded Detents</i> </p>

Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074





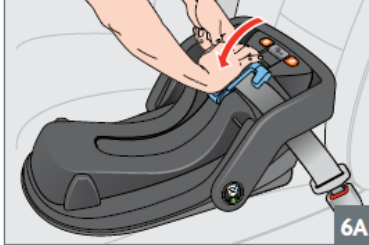

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p><i>Id.</i>, Fig. 9 (annotated).</p> <p><b>Fig.10.</b></p> <p>U-Shaped Strap Deflecting Member 138</p> <p>Seat Belt 136</p> <p>Belt Guides 134</p> <p><i>Id.</i>, Fig. 10 (annotated).</p>



## Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

Claim Language	Invalidity Chart for U.S. Patent No. 9,499,074
Claim Language	Prior Art
	 <p data-bbox="1087 1166 1398 1201"><i>Id.</i>, Fig. 10 (annotated).</p> <p data-bbox="575 1240 1902 1453">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill in the art to have improved the <i>Boulevard 70 CS</i> with <i>Uppa Baby Mesa</i>’s tensioning mechanism. Furthermore, although <i>Uppa Baby Mesa</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Uppa Baby Mesa</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Uppa Baby Mesa</i> discloses:</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

	<div data-bbox="840 186 1606 235">  <b>SECURING THE BASE (LAP AND SHOULDER BELT INSTALLATION)</b> </div> <div data-bbox="829 243 1207 438"> <p><b>STEP 4A:</b> Route the vehicle belt through the belt path while guiding the lap portion of the belt as close as possible to the top of the lock-off where the door hinges. Buckle the vehicle belt.</p> </div> <div data-bbox="1228 251 1606 503">  </div> <div data-bbox="829 527 1207 779">  </div> <div data-bbox="1228 527 1606 779">  </div> <div data-bbox="829 787 1606 950"> <p><b>STEP 5A:</b> Hold shoulder portion of belt above base. With one hand push down base in the direction of the seat bight (crease of seat) and hold firm as you pull shoulder belt <b>1</b>. While holding taut, slide shoulder belt back through the belt path as close as possible to the top of the lock-off <b>2</b>.</p> </div> <div data-bbox="829 958 1260 1015"> <p><b>NOTE: TIGHTNESS INDICATOR SHOULD BE GREEN.</b></p> </div> <div data-bbox="1333 893 1606 1015">  </div> <div data-bbox="829 1055 1207 1291"> <p><b>STEP 6A:</b> Close the lock-off door.  <b>NOTE:</b> Check that the belt doesn't move more than 1 inch at belt path. If you are having trouble achieving a secure installation in the center seat position, please install using the locking clip (pg. 28).</p> </div> <div data-bbox="1228 1063 1606 1315">  </div> <div data-bbox="1039 1323 1396 1356"> <p> UPPAbaby MESA Instruction Manual</p> </div> <div data-bbox="1617 1323 1669 1356"> <p>23</p> </div>
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Uppa Baby Mesa Instruction Manual, p. 23.

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p>In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>B-Safe 35</i>’s tensioning mechanism. Furthermore, although <i>B-Safe 35</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>B-Safe 35</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>B-Safe 35</i> discloses:</p> <ul style="list-style-type: none"> <li>• <i>Place the base in the desired location on the vehicle seat and open the upper and lower portions of the lock-off.</i></li> <li>• <i>Pull the vehicle seat belt out.</i></li> </ul> <div data-bbox="1289 602 1715 860" data-label="Image"> </div> <ul style="list-style-type: none"> <li>• <i>Ensure that the vehicle seat belt is not twisted and then route the vehicle belt under and through the first belt guide, through the open lock-off and down through the second belt guide.</i></li> <li>• <i>Buckle the vehicle seat belt.</i></li> </ul> <div data-bbox="1289 876 1715 1136" data-label="Image"> </div> <div data-bbox="745 1170 825 1226" data-label="Image"> </div> <p style="text-align: center;">Britax B-Safe 35 User Guide, p. 16.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

	<div data-bbox="909 168 1705 240" data-label="Section-Header"> <p>Installing the Base</p> </div> <div data-bbox="814 272 1234 435" data-label="List-Group"> <ul style="list-style-type: none"> <li>• Press the base firmly into the vehicle seat while removing all slack from first the lap portion and then the shoulder portion of the vehicle seat belt.</li> </ul> </div> <div data-bbox="1247 277 1654 524" data-label="Image"> </div> <div data-bbox="814 540 1234 638" data-label="List-Group"> <ul style="list-style-type: none"> <li>• Hold the vehicle belt tight and close the upper portion of the lock-off.</li> </ul> </div> <div data-bbox="1247 540 1654 787" data-label="Image"> </div> <div data-bbox="814 800 1234 930" data-label="List-Group"> <ul style="list-style-type: none"> <li>• Press firmly on the upper portion of the lock-off and close the lower portion to secure.</li> </ul> </div> <div data-bbox="1247 805 1654 1052" data-label="Image"> </div> <div data-bbox="814 1166 1623 1336" data-label="List-Group"> <ul style="list-style-type: none"> <li>• Verify that the vehicle belt is tight and that the base is secure. The base is secure when it moves less than 1 inch (2.5 cm) front-to-back or side-to-side at the vehicle belt path.</li> <li>• Correct recline angle is achieved when the green marker on each recline angle indicator is visible between the two lines.</li> </ul> </div> <div data-bbox="1633 1352 1705 1409" data-label="Page-Footer"> <p>17</p> </div>
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*Id.*, p. 17.

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	<p>In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Williams</i>’s tensioning mechanism. Furthermore, although <i>Williams</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Williams</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Williams</i> discloses:</p> <p>“Referring to FIG. 1, the base 10 may be formed integrally in one piece or an assembly of multiply piece, having a curved supporting surface 11 for support a infant travel seat thereon and a pair of side guiding openings 12 for allowing a belt passing therethrough so as to secure the base 10 to the vehicle seat. Referring to FIGS. 2 and 3, the biting compartment 32 is formed on the base 10 between the pair of side guiding openings 12 where the belt 20 could pass is passing thereover. The covering plate 31 has one end coaxial with the colored rotor 35 and pivoted to one end of the biting compartment 32 for closing the biting compartment 32 when being rotated to a closed position, and another end pivoted with a rotatable depressor 34 for pressing the belt 20 into the biting compartment 32 when the covering plate 31 is rotated to and positioned in the closed position. [P]referably, a resilient element 36 may be mounted between the covering plate 31 and the rotatable depressor 34, so as to keep the rotatable depressor 34 in an opened position. In one embodiment, the resilient element 36 is a compression spring for biasing the rotatable depressor 34 downward and keeping in the opened position. When the covering plate 31 is carrying the rotatable depressor 34 to press the belt 20, it would compress the resilient element 36 and cause the rotatable depressor 34 to rotate and close to the covering plate 31 to a closed position.” <i>Id.</i>, 2:49-3:7.</p> <p>“Referring to FIGS. 5 and 6, before tying the base <b>10</b> to a vehicle seat, the belt <b>20</b> is passing through the pair of side guiding openings <b>12</b> and secure its free end to an anchor which is mounted within the vehicle seat. By this way, may secure the base <b>10</b> to the vehicle seat tightly.” <i>Id.</i>, 3:41-45.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

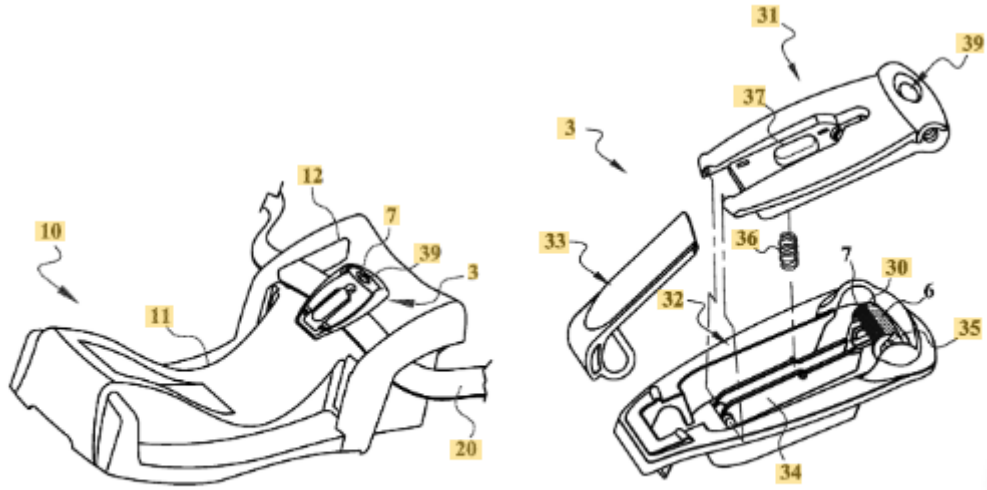
Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p>“In order to inhibit the sliding between the base <b>10</b> and belt <b>20</b>, the user may rotate the covering plate <b>31</b> to close the biting compartment <b>32</b>, thus would carry the rotatable depressor <b>34</b> to press the belt <b>20</b> into the biting compartment <b>32</b>. After being closed the covering plate <b>31</b>, the user may rotate the holding plate <b>33</b> to engage and lock the covering plate <b>31</b> in the closed position.” <i>Id.</i>, 3:16-52.</p> <div style="text-align: center;">  <p><b>FIG. 1</b>                      <b>FIG. 2</b></p> </div> <p><i>Id.</i>, FIGS. 1, 2.</p>

Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

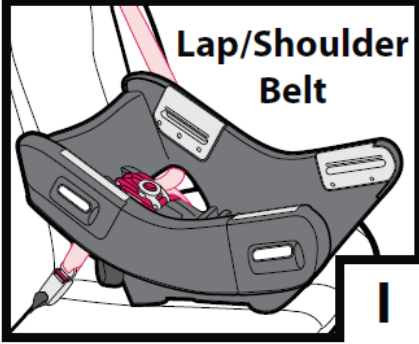
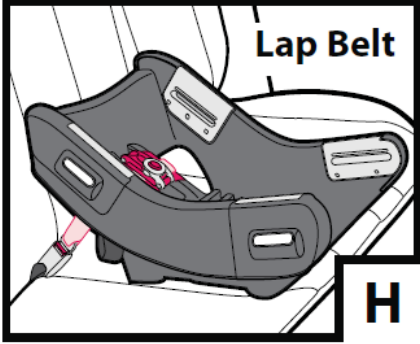

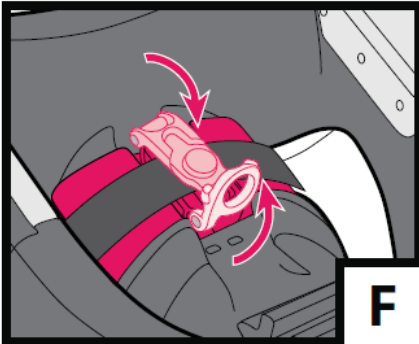

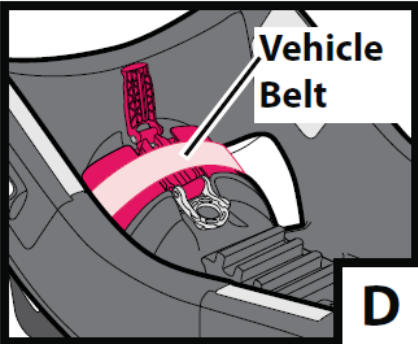
Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div data-bbox="968 349 1539 841"></div> <p><b>FIG. 5</b></p> <p><i>Id.</i>, FIG. 5.</p> <p>In a further alternative, to the extent <i>the Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Graco Smart Seat</i>’s tensioning mechanism. Furthermore, although <i>Graco Smart Seat</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Graco Smart Seat</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Graco Smart Seat</i> discloses:</p>

## Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p>When using the vehicle seat belts to install the base, the lock-off is <b>ALWAYS</b> used to secure both belts of the lap or lap/shoulder belt.</p> <ol style="list-style-type: none"> <li>1. Position base in vehicle seat as shown <b>C</b>.</li> <li>2. Open the lock-off and route the vehicle belt through the belt path and over the lock-off <b>D</b>.</li> <li>3. Buckle seat belt. Pull up on shoulder belt while pushing down on base to tighten <b>E</b>.</li> <li>4. Close lock-off <b>F</b>.</li> <li>5. Test base for secure installation by moving front to back and left to right at the belt path <b>G</b>. Base should not move more than 1 inch ( 2.54 cm). If belt loosens or lengthens, repeat procedure.</li> </ol> <p>Lap Belt <b>H</b> and Lap/Shoulder Belt <b>I</b> should appear as shown when installed.</p> <p style="text-align: center;"><b>30</b></p> <p style="text-align: center;"><i>Graco Smart Seat Owner's Manual, p. 30.</i></p>



Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div></div> <p>31</p> <p><i>Id.</i>, p. 31.</p> <p>One of ordinary skill in the art would have been motivated to combine <i>the Boulevard 70 CS</i> with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i>, and/or <i>Graco Smart Seat</i> because these references teach systems securing child seats to vehicle seats using securing mechanisms. The <i>Boulevard 70 CS</i> uses a tensioning mechanism to ensure “that the child seat cannot be moved front to back or side to side more than 1 in. (2.5 cm) at the belt path. If the child seat is not secure, repeat installation or use a different seating location.” <i>Boulevard CS 70 User Guide</i>, p. 21, 23, 25, 27, 29, 31.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	<p>As identified, the installation of <i>Boulevard 70 CS</i>'s child seat can sometimes result in loose installations. <i>Id.</i> Therefore, a person of ordinary skill in the art would have looked to improve <i>Boulevard CS 70</i>'s locking tabs with one of the tensioning mechanisms disclosed in <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

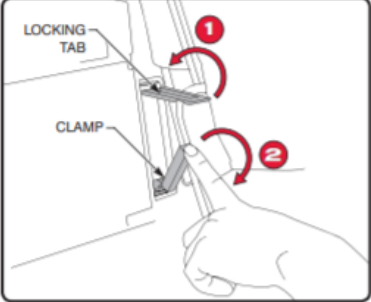


Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
<p>[1(b)(2)] wherein the tensioning mechanism is movable downwardly and forwardly to a first position substantially adjacent to the seat base and upwardly and rearwardly to a second position displaced therefrom,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism is movable downwardly and forwardly to a first position substantially adjacent to the seat base and upwardly and rearwardly to a second position displaced therefrom. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;"></p> <p style="text-align: center;"><i>Boulevard 70 CS User Guide</i>, p. 14.</p>

Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

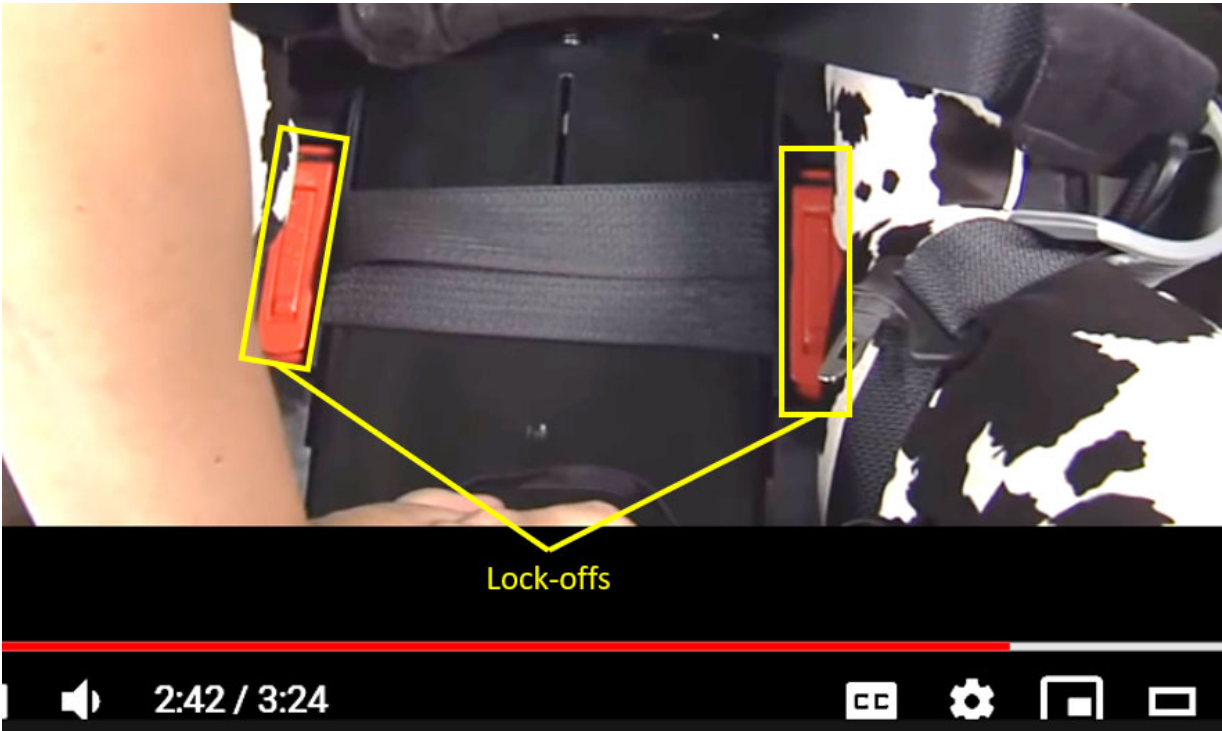
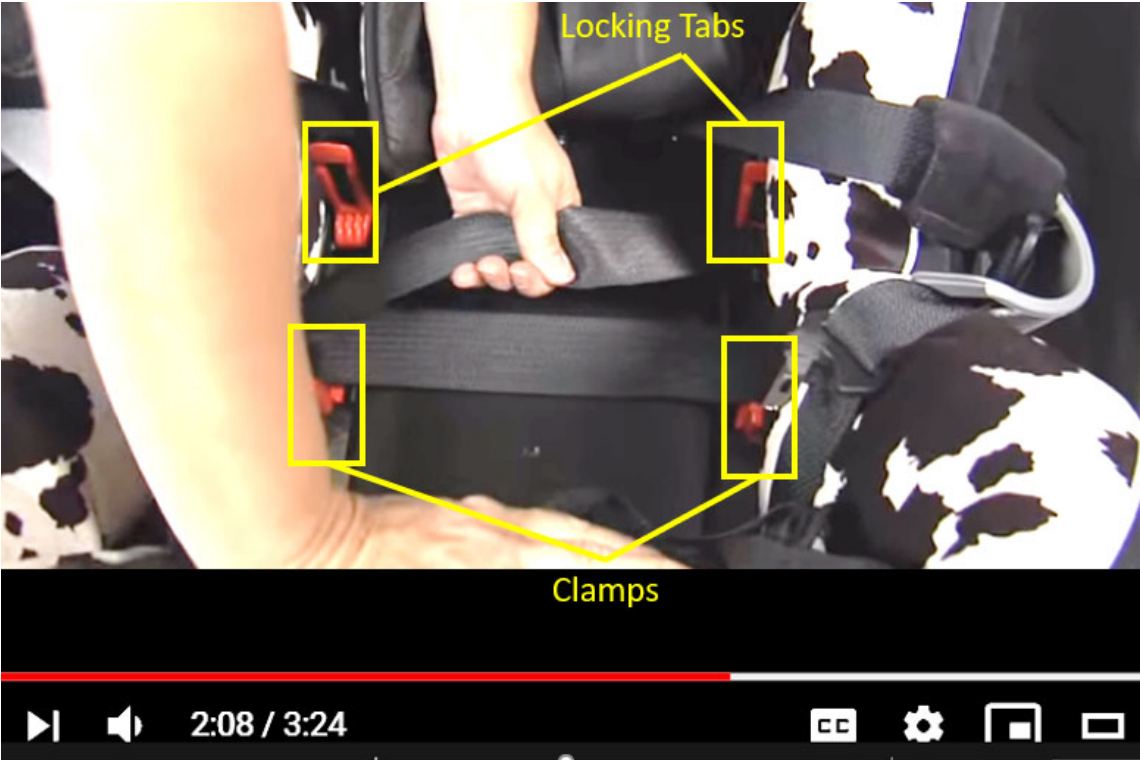
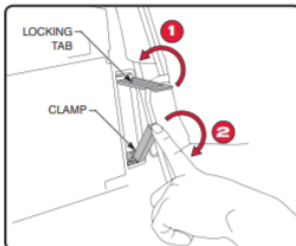
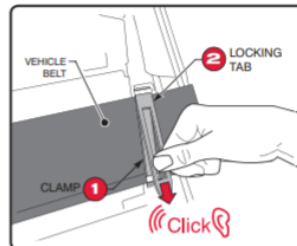

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div><p>Lock-offs</p><p>2:42 / 3:24</p><p>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</p></div>

Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

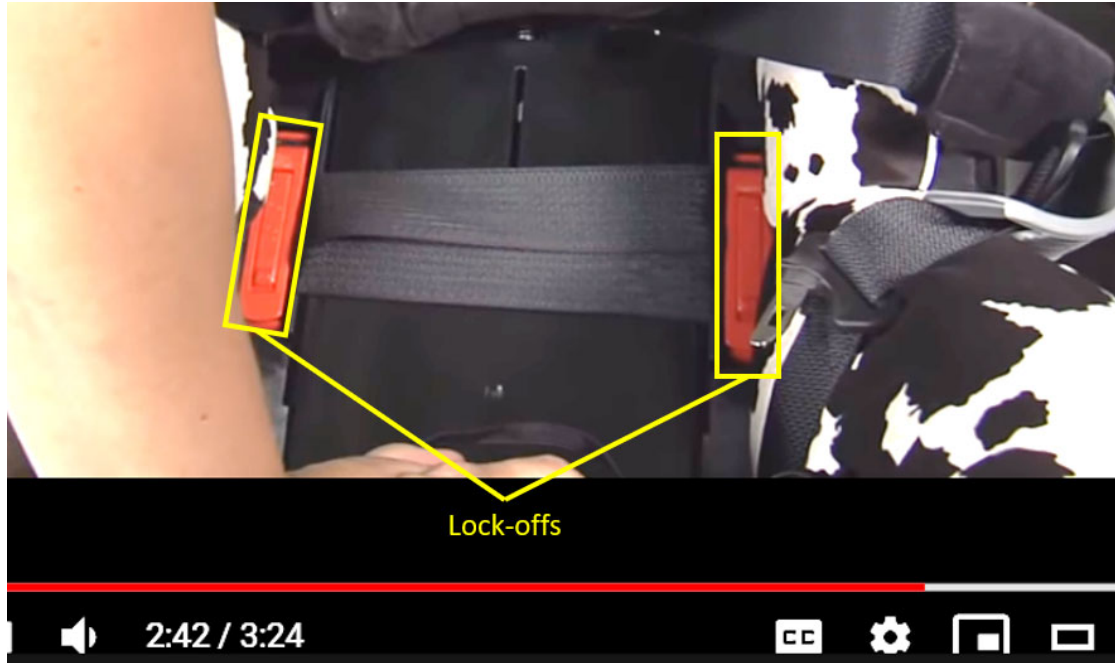
Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div><p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p><p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation in claim 1.</p></div>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
<p>[1(b)(3)] wherein placing the tensioning mechanism in the second position allows the seat base to receive the belt, and movement of the tensioning mechanism from the second position to the first position presses the belt against the first and second edges and deflects a portion of the belt between first and second edges to be closer to the seat or backrest portion than portions of the belt that engage the first and second edges and thus applies tension to the belt to secure the child seat to the vehicle seat in a tensioned configuration,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious placing the tensioning mechanism in the second position allows the seat base to receive the belt, and movement of the tensioning mechanism from the second position to the first position presses the belt against the first and second edges and deflects a portion of the belt between first and second edges to be closer to the seat or backrest portion than portions of the belt that engage the first and second edges and thus applies tension to the belt to secure the child seat to the vehicle seat in a tensioned configuration. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div data-bbox="882 617 1533 1218"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> </div> </div> <p style="text-align: center;"></p> </div>

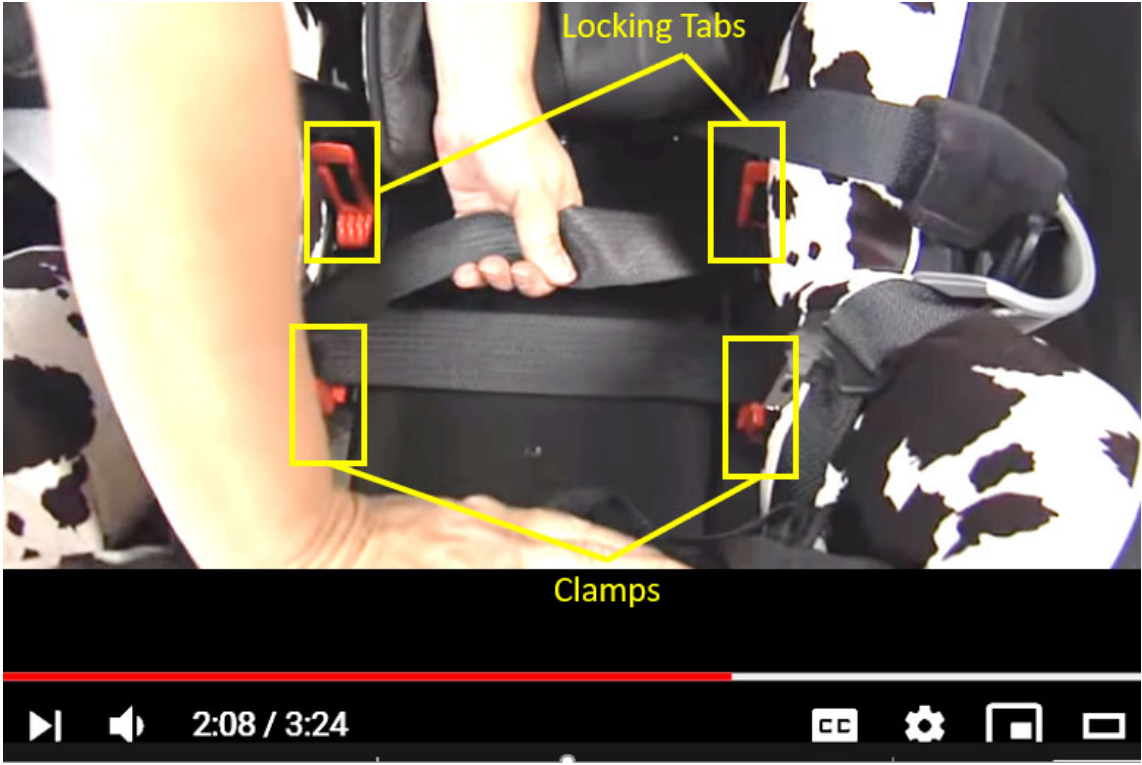
*Boulevard 70 CS User Guide*, p. 14.

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>



**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**


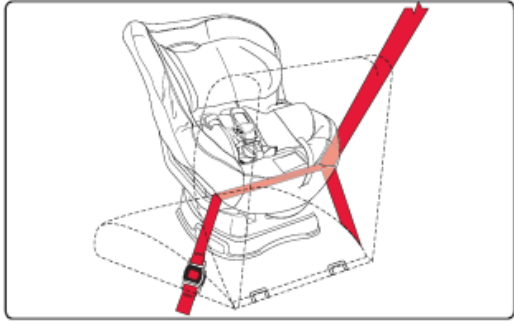
Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p data-bbox="699 1154 1892 1224"><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p data-bbox="575 1268 1892 1409">Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p>




**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	<p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(c)] wherein the seat base of the child seat is configured to receive the belt when the seat base is in both a rear-facing orientation and when the seat base is in a front-facing orientation.	<p><i>Boulevard 70 CS</i> discloses or renders obvious the seat base of the child seat is configured to receive the belt when the seat base is in both a rear-facing orientation and when the seat base is in a front-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 22, 28.</p>

## Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

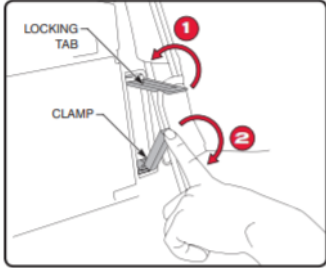
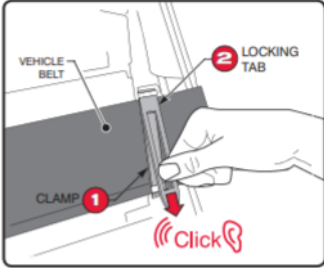

Claim Language	Invalidity Chart for U.S. Patent No. 9,499,074
	Prior Art
	<p data-bbox="997 358 1213 380"><b>Rear-Facing Installation</b></p> <p data-bbox="997 401 1297 422"><b>Lap-Shoulder Belt Installation</b></p> <div data-bbox="997 443 1507 987"> <p data-bbox="1045 459 1192 480"><b>Before You Begin:</b></p> <ul data-bbox="1045 488 1491 971" style="list-style-type: none"> <li>• Check that your vehicle belt is compatible for use with child seats. See pages 6 – 8 for more information.</li> <li>• If your vehicle seat belt system includes a locking feature, use of the lock-offs is not required as long as the vehicle seat belt system is locked. Check your vehicle owner's manual to determine how to lock your vehicle seat belt system when installing a child restraint.</li> <li>• Recline this child seat to position 3 and place rear-facing on the vehicle seat (see page 15).</li> <li>• When properly installed in the rear-facing position, the back angle of the child seat should be at least 30° for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. Use the blue line as a guide to achieve the proper recline angle for rear-facing installations. The blue line will be parallel to the ground when the child seat angle is at the center of the angle range (30 – 45°). If necessary, the proper recline angle can be achieved by placing a rolled towel or pool noodle in the vehicle seat bight.</li> <li>• Britax recommends that the Versa-Tether is used at all times. Using the tether will improve the stability of the child seat and reduce the risk of injury. Check your vehicle owner's manual for tether anchor locations. See page 18 for possible rear-facing tether configurations.</li> </ul>  </div>  <p data-bbox="997 1325 1396 1346">Install with the lap-shoulder belt as shown above.</p> <p data-bbox="1184 1365 1310 1393"><i>Id.</i>, p. 22.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

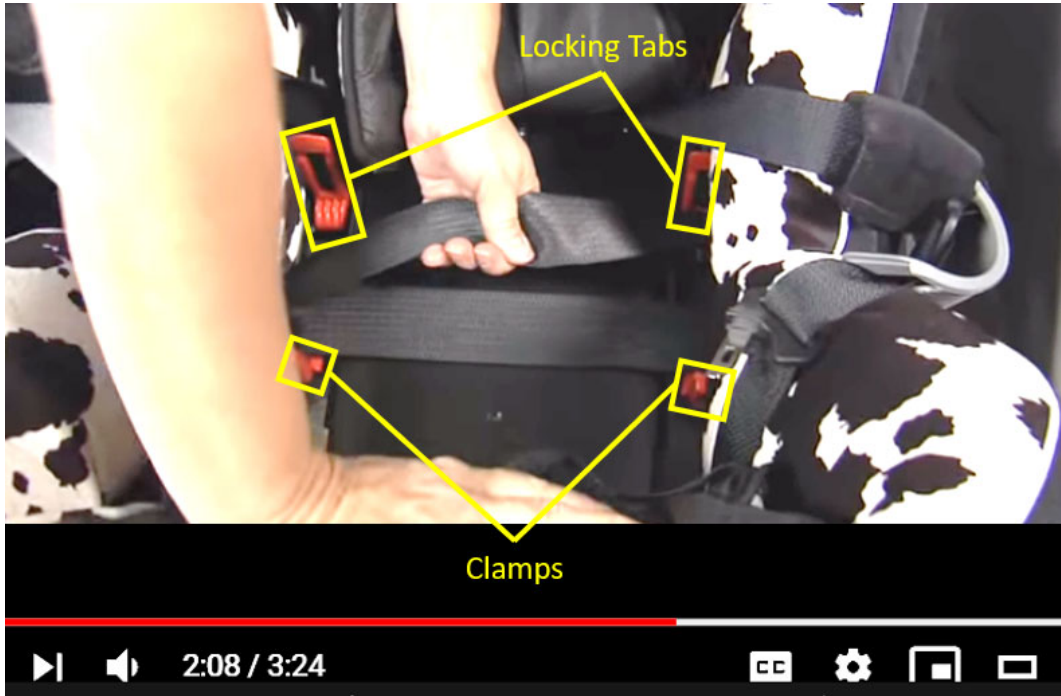
Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div data-bbox="940 423 1451 467" data-label="Section-Header"> <p>Forward-Facing Installation</p> </div> <div data-bbox="961 483 1304 508" data-label="Section-Header"> <p>Lap-Shoulder Belt Installation</p> </div> <div data-bbox="961 516 1528 982" data-label="Complex-Block"> <p> <b>Before You Begin:</b></p> <ul style="list-style-type: none"> <li>• Check that your vehicle belt is compatible for use with child seats. See pages 6 – 8 for more information.</li> <li>• If your vehicle seat belt system includes a locking feature, use of the lock-offs is not required as long as the vehicle seat belt system is locked. Check your vehicle owner's manual to determine how to lock your vehicle seat belt system when installing a child restraint.</li> <li>• Remove the Versa-Tether from the pouch and place it up and over the child seat back.</li> <li>• Britax recommends that the Versa-Tether is used at all times. Using the tether will improve the stability of the child seat and reduce the risk of injury. Check your vehicle owner's manual for tether anchor locations. Only attach the Versa-Tether to anchor points designated to the chosen seating position as indicated by your vehicle owner's manual.</li> <li>• Adjust this child seat to position 1 or 2 and place forward-facing on the vehicle seat (see page 15).</li> <li>• Ensure that no more than 20% or 3 in. (7.6 cm) of the base hangs over the edge of the vehicle seat.</li> </ul> </div> <div data-bbox="961 998 1528 1367" data-label="Image"> </div> <div data-bbox="961 1377 1409 1401" data-label="Caption"> <p>Install with the lap-shoulder belt as shown above.</p> </div>

*Id.*, p. 28.

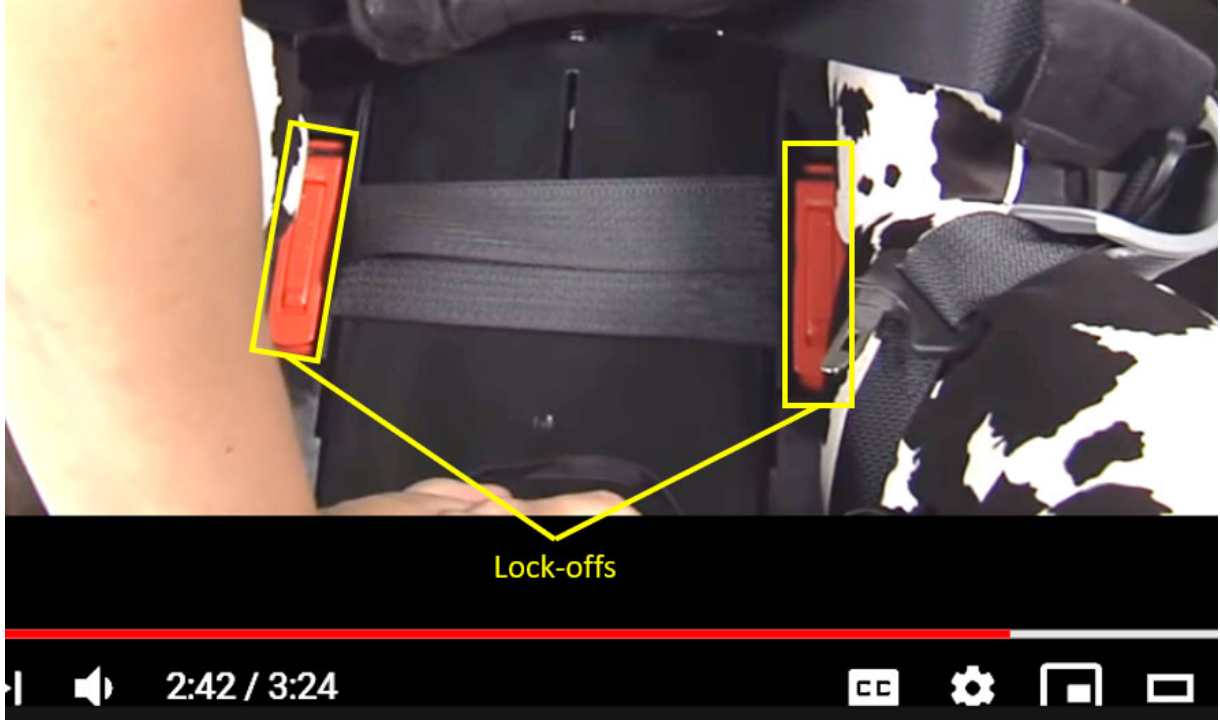
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	<i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 1.
2. The child seat according to claim 1, wherein the tensioning mechanism is configured to rotate, in response to receiving a substantially vertical force, from the second position to the first position to apply tension to the belt to secure the child seat to the vehicle seat in a tensioned configuration.	<p><i>Boulevard 70 CS</i> discloses or renders obvious that the tensioning mechanism is configured to rotate, in response to receiving a substantially vertical force, from the second position to the first position to apply tension to the belt to secure the child seat to the vehicle seat in a tensioned configuration. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;"> 14</p> <p style="text-align: center;"><i>Boulevard 70 CS User Guide</i>, p. 14.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 2.</p>
3. The child seat according to claim 1,	<p><i>Boulevard 70 CS</i> discloses or renders obvious the seat base is configured to receive the belt so as to define a first belt path spanning the first and second edges. <i>Boulevard 70 CS User Guide</i>, p. 23.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

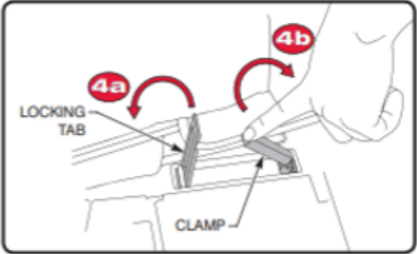


Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
<p>wherein the seat base is configured to receive the belt so as to define a first belt path spanning the first and second edges.</p>	<div data-bbox="814 423 1276 488"> <p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> </div> <div data-bbox="814 493 1241 581"> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> </div> <div data-bbox="846 586 1094 634"> <p>a Open the locking tab b Open the clamp</p> </div> <div data-bbox="814 639 1268 760"> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> </div> <div data-bbox="814 764 1268 911"> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> </div> <div data-bbox="846 915 1262 1024"> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> </div> <div data-bbox="814 1040 1268 1128"> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> </div> <div data-bbox="814 1143 1703 1268"> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1289 370 1703 618"> <p>Diagram 4a shows a hand opening a 'LOCKING TAB' with a red arrow. Diagram 4b shows a hand opening a 'CLAMP' with a red arrow.</p> </div> <div data-bbox="1289 639 1703 894"> <p>Diagram 5 shows a child's torso with a red vehicle belt being routed through two slots on the back. A red arrow indicates the direction of the belt path.</p> </div> <div data-bbox="1289 915 1703 1166"> <p>Diagram 7 shows a child's torso with a red vehicle belt. A red arrow indicates the top (shoulder) part of the belt being pulled through a lock-off mechanism to remove slack.</p> </div> <p style="text-align: center;"><i>Id.</i>, p. 23.</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

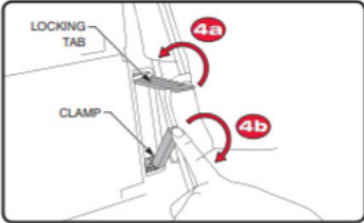
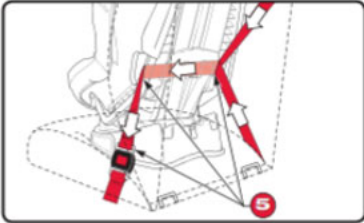

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	<p><i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat's</i> tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 3.</p>
<p>5. The child seat according to claim 3,</p> <p>wherein the seat base is further configured to receive the belt so as to define the first belt path when the child seat is in the rear-facing orientation, and</p> <p>wherein the seat base is configured to receive the belt so as to define a second belt path spanning the first and second edges when the child seat is in the forward-facing orientation.</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the seat base is further configured to receive the belt so as to define the first belt path when the child seat is in the rear-facing orientation, and wherein the seat base is configured to receive the belt so as to define a second belt path spanning the first and second edges when the child seat is in the forward-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 23, 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>



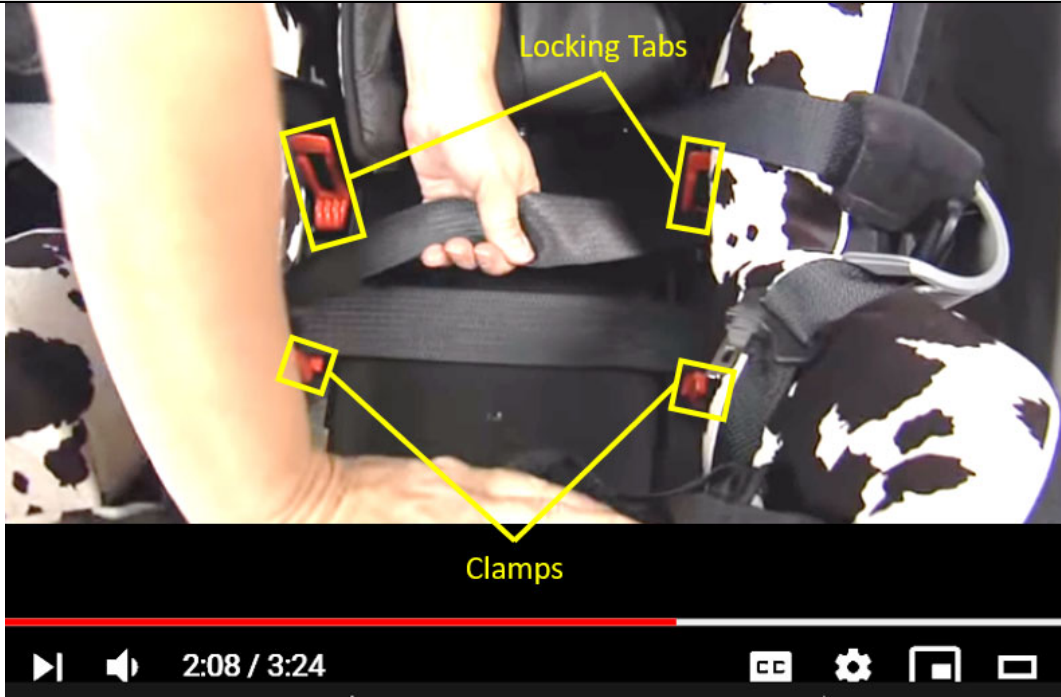
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Claim Language	Invalidity Chart for U.S. Patent No. 9,499,074
	Prior Art
	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>    <p><i>Id.</i>, p. 23.</p>


**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p><b>8</b> Attach the Versa-Tether to a designated anchor (see vehicle owner's manual) and remove all slack (see pages 17 – 19).</p> <p><i>Id.</i>, p. 29.</p>   

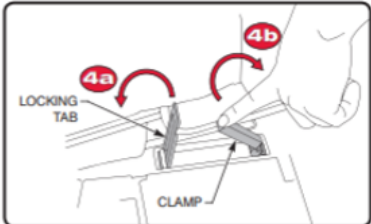


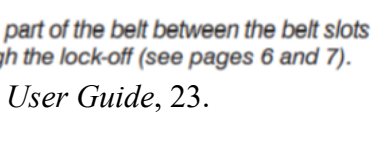
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**


<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

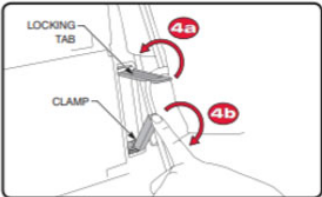
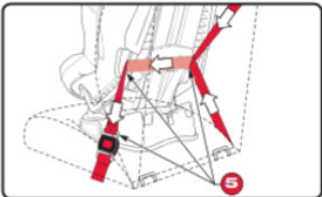

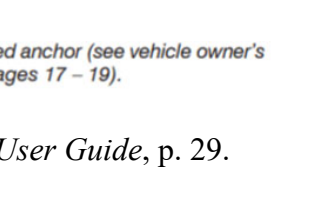
Claim Language	Invalidity Chart for U.S. Patent No. 9,499,074
<p>6. The child seat according to claim 5, wherein the first belt path is defined between the tensioning mechanism and the seat base at a position proximate an intermediate region of the seat portion.</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path is defined between the tensioning mechanism and the seat base at a position proximate an intermediate region of the seat portion. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, 23.</p> </div> <div style="width: 35%;">     </div> </div>



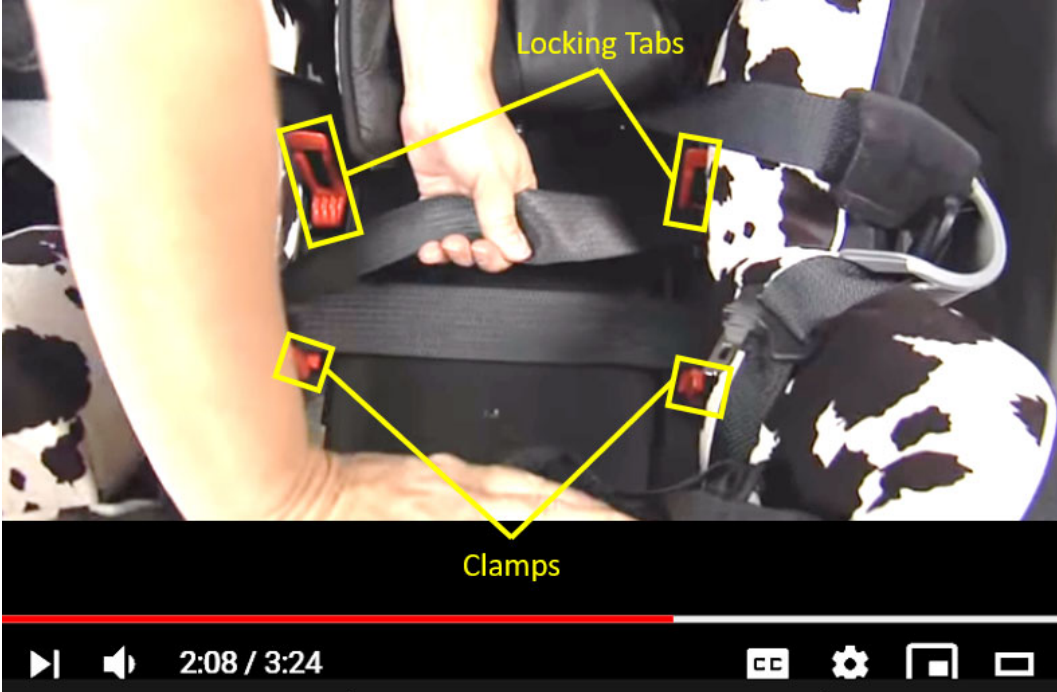
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 6.</i></p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

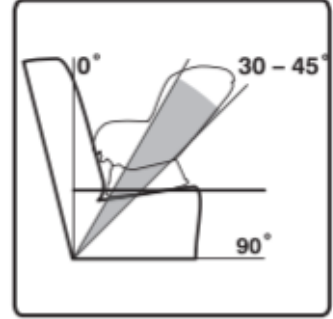
Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
<p>7. The child seat according to claim 5,</p> <p>wherein the second belt path is defined between the tensioning mechanism and the seat base at a position proximate an intersection of the backrest portion and the seat portion.</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious that the second belt path is defined between the tensioning mechanism and the seat base at a position proximate an intersection of the backrest portion and the seat portion. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p><b>8</b> Attach the Versa-Tether to a designated anchor (see vehicle owner's manual) and remove all slack (see pages 17 – 19).</p> </div> <div style="width: 35%;">     </div> </div> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, p. 29.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

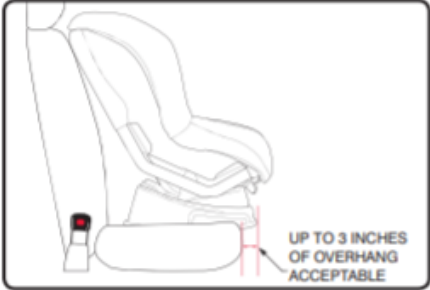
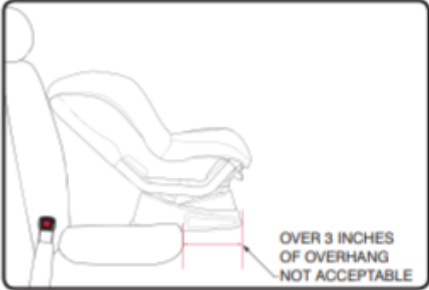

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 7.</p>
[16(p)] A method for manufacturing a child seat configured to be secured to a vehicle seat in both a rear-facing orientation and	<p><i>Boulevard 70 CS</i> discloses or renders obvious a method for manufacturing a child seat configured to be secured to a vehicle seat in both a rear-facing orientation and a front-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 15; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>



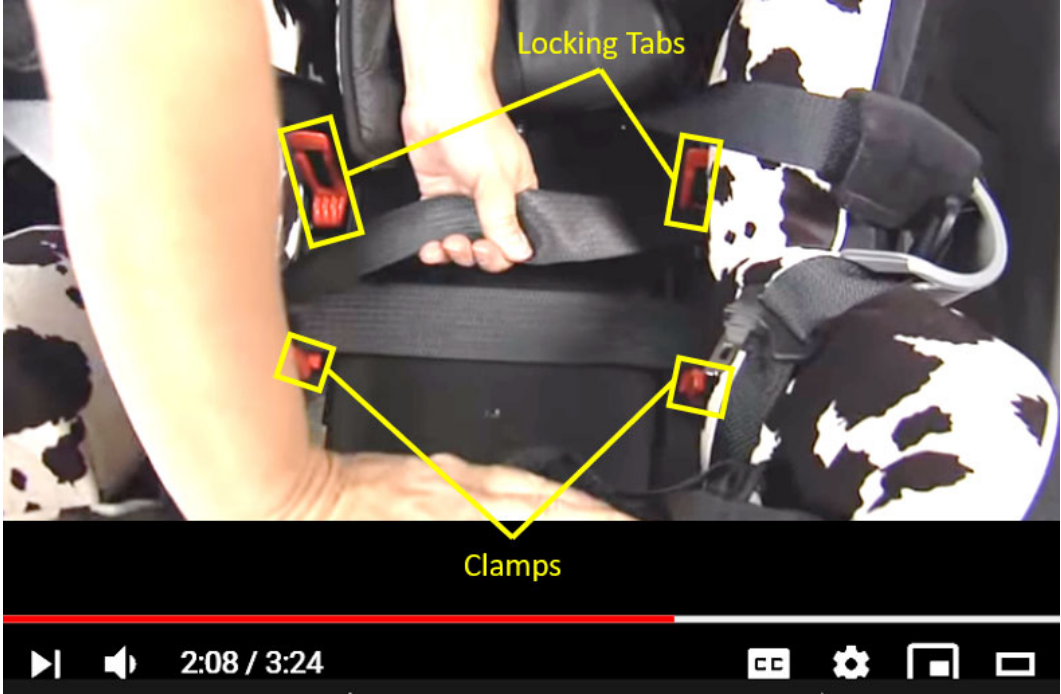
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
a front-facing orientation, the method comprising:	<p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p>  <p><i>Boulevard 70 CS User Guide, p. 15.</i></p>


**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>UP TO 3 INCHES OF OVERHANG ACCEPTABLE</p> <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p>OVER 3 INCHES OF OVERHANG NOT ACCEPTABLE</p> <p><i>Unacceptable overhang</i></p> </div> </div> <div style="text-align: right; margin-top: 10px;">  </div> <p style="text-align: right;"><i>Id.</i>, p. 15.</p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

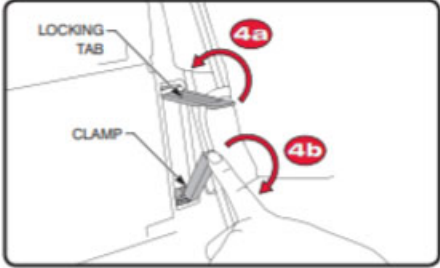
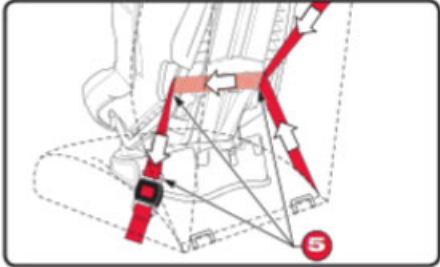

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 16.</i></p>
16(a) providing a seat base defining a seat portion, a backrest portion, and first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions, wherein the seat base is	<p>See claim element [1(a)(1)] and [(1)(a)(2)].</p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 16.</i></p>

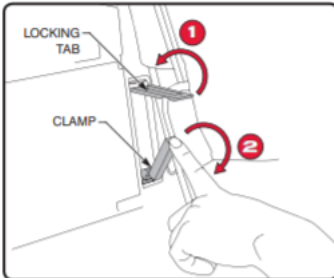
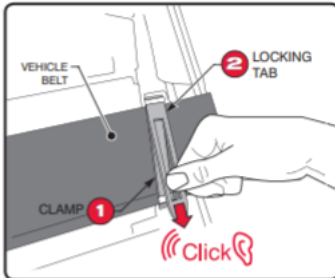

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
configured to receive a belt of the vehicle seat in an untensioned state to secure the child seat to the vehicle seat in an untensioned configuration; and	
16(b)(1) attaching a proximal end of a tensioning mechanism the backrest portion of to the seat base, wherein a distal end of the tensioning mechanism comprises a sitting surface for an occupant of the child seat and an engaging surface facing opposite to the sitting surface,	<i>Boulevard 70 CS</i> discloses or renders obvious the seat base is configured to receive a belt of the vehicle seat in an untensioned state to secure the child seat to the vehicle seat in an untensioned configuration. <i>Boulevard 70 CS User Guide</i> , p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> .

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

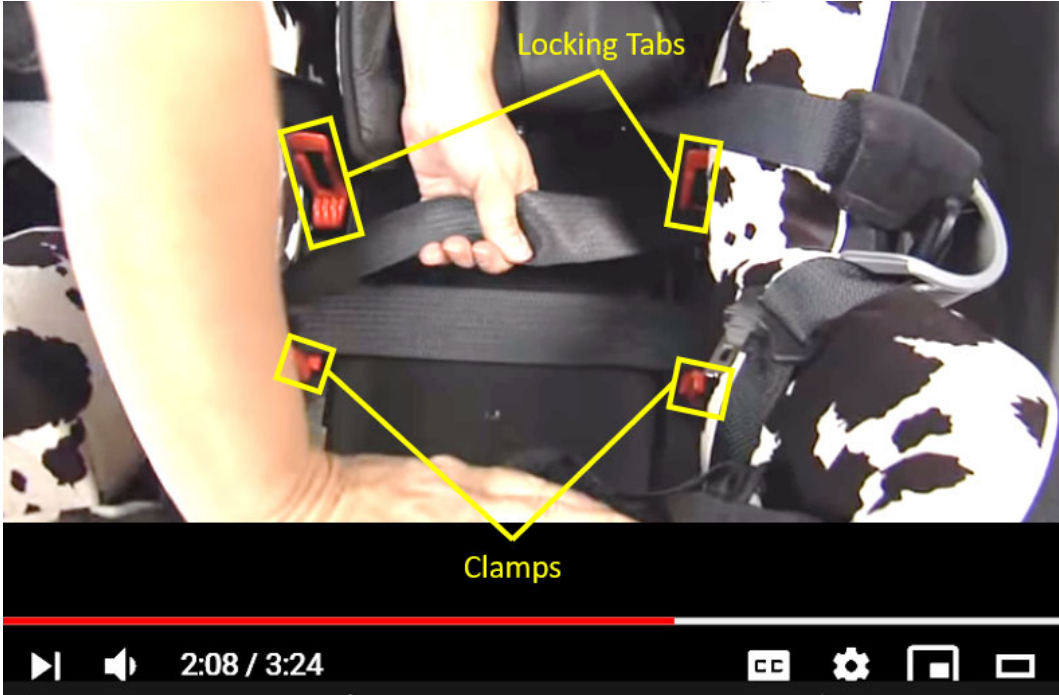
Claim Language	Invalidity Chart for U.S. Patent No. 9,499,074
	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p>    <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p> 14</p> <p><i>Boulevard 70 CS User Guide, p. 14</i></p>



**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 16.</i></p>



**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

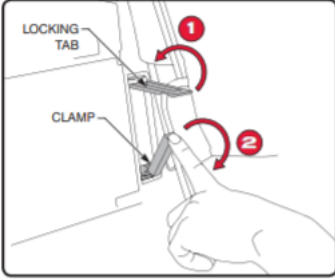
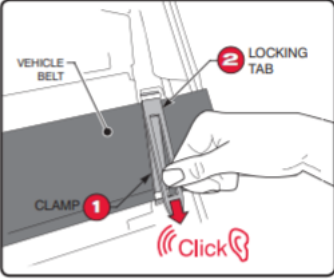

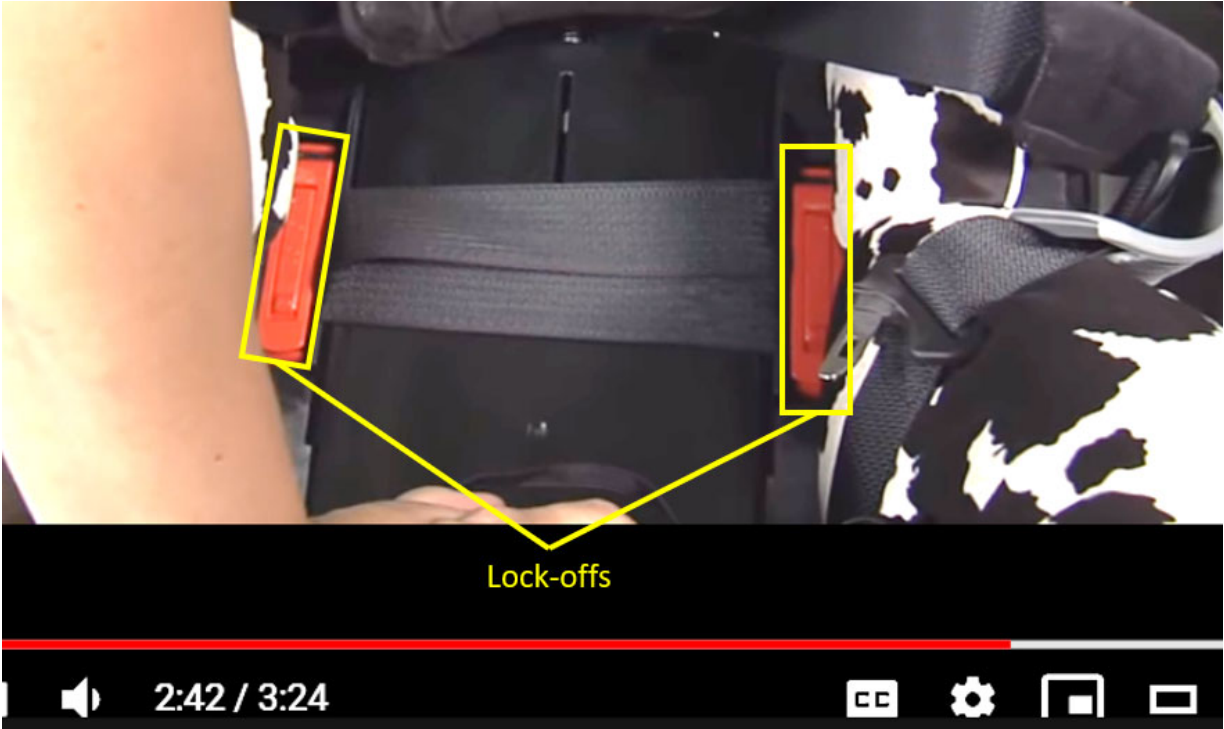
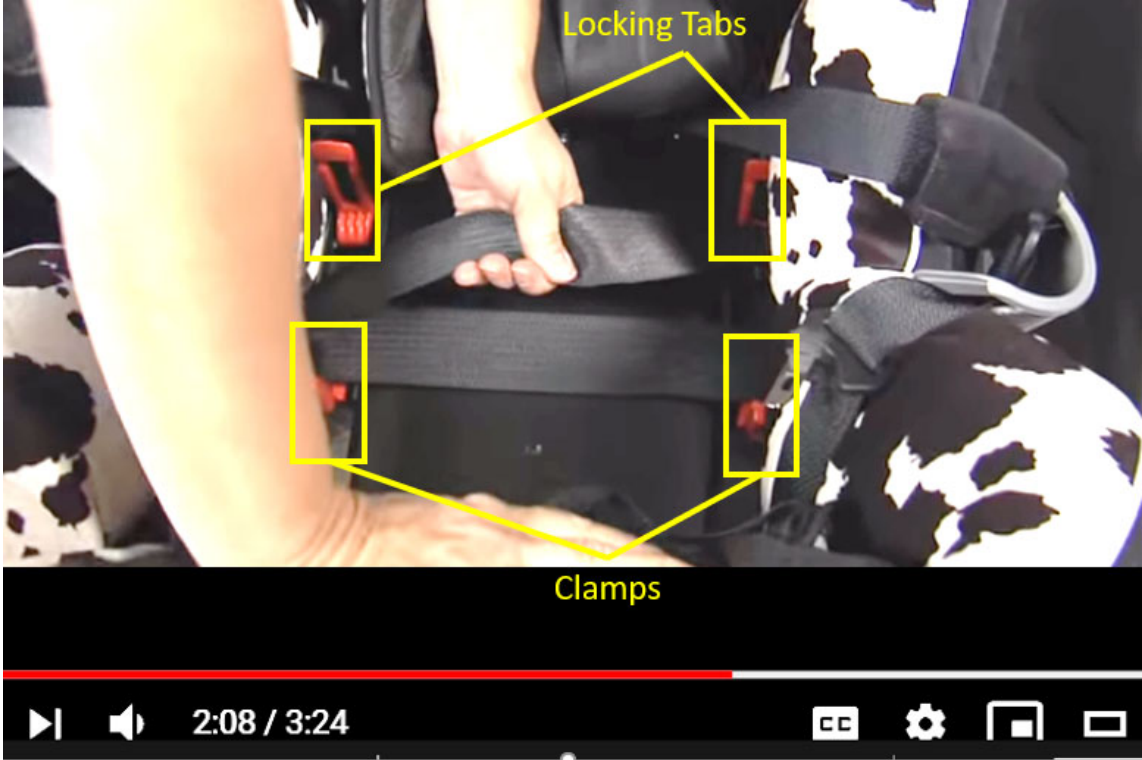
Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
<p>16(b)(2) wherein the tensioning mechanism is rotatable downwardly and forwardly to a first position substantially adjacent to the seat base and upwardly and rearwardly to a second position displaced therefrom,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism is rotatable downwardly and forwardly to a first position substantially adjacent to the seat base and upwardly and rearwardly to a second position displaced therefrom. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div data-bbox="848 548 1566 1211"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <div style="text-align: center; margin-top: 20px;">  </div> <p style="text-align: center; margin-top: 20px;"><i>Boulevard 70 CS User Guide</i>, p. 14</p> </div>

Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div><p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p></div>

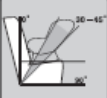
**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 16.</i></p>

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

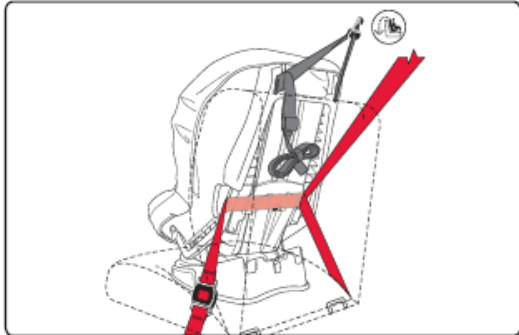
<b>Invalidity Chart for U.S. Patent No. 9,499,074</b>	
<b>Claim Language</b>	<b>Prior Art</b>
16(b)(3) wherein placing the tensioning mechanism in the second position allows the seat base to receive the belt, and the movement of the tensioning mechanism from the second position to the first position presses the belt against the first and second edges and deflects a portion of the belt between first and second edges to be closer to the seat or backrest portion than portions of the belt that engage the first and second edges and thus applies tension to the belt to secure the child seat to the vehicle seat in a tensioned configuration,	See claim element 1(b)(3).  <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 16.
16(c) wherein the seat base of the child seat is configured to receive the belt in both a rear-facing and front-facing orientation.	<i>Boulevard 70 CS</i> discloses or renders obvious the seat base of the child seat is configured to receive the belt in both a rear-facing and front-facing orientation. <i>Boulevard 70 CS User Guide</i> , p. 22, 28,

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<div data-bbox="982 370 1402 407" data-label="Section-Header"> <p><b>Rear-Facing Installation</b></p> </div> <div data-bbox="1003 418 1283 440" data-label="Section-Header"> <p><b>Lap-Shoulder Belt Installation</b></p> </div> <div data-bbox="1003 451 1472 954" data-label="Complex-Block"> <p><b>Before You Begin:</b></p> <ul style="list-style-type: none"> <li>• Check that your vehicle belt is compatible for use with child seats. See pages 6 – 8 for more information.</li> <li>• If your vehicle seat belt system includes a locking feature, use of the lock-offs is not required as long as the vehicle seat belt system is locked. Check your vehicle owner's manual to determine how to lock your vehicle seat belt system when installing a child restraint.</li> <li>• Recline this child seat to position 3 and place rear-facing on the vehicle seat (see page 15).</li> <li>• When properly installed in the rear-facing position, the back angle of the child seat should be at least 30° for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. Use the blue line as a guide to achieve the proper recline angle for rear-facing installations. The blue line will be parallel to the ground when the child seat angle is at the center of the angle range (30 – 45°). If necessary, the proper recline angle can be achieved by placing a rolled towel or pool noodle in the vehicle seat bight.</li> <li>• Britax recommends that the Versa-Tether is used at all times. Using the tether will improve the stability of the child seat and reduce the risk of injury. Check your vehicle owner's manual for tether anchor locations. See page 18 for possible rear-facing tether configurations.</li> </ul>  </div> <div data-bbox="1003 971 1472 1263" data-label="Image"> </div> <div data-bbox="1003 1271 1367 1292" data-label="Caption"> <p>Install with the lap-shoulder belt as shown above.</p> </div>

*Id.*, p. 22.

**Exhibit A3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,499,074**

Invalidity Chart for U.S. Patent No. 9,499,074	
Claim Language	Prior Art
	<p>Forward-Facing Installation</p> <p><b>Lap-Shoulder Belt Installation</b></p> <p><b>Before You Begin:</b></p> <ul style="list-style-type: none"> <li>• Check that your vehicle belt is compatible for use with child seats. See pages 6 – 8 for more information.</li> <li>• If your vehicle seat belt system includes a locking feature, use of the lock-offs is not required as long as the vehicle seat belt system is locked. Check your vehicle owner's manual to determine how to lock your vehicle seat belt system when installing a child restraint.</li> <li>• Remove the Versa-Tether from the pouch and place it up and over the child seat back.</li> <li>• Britax recommends that the Versa-Tether is used at all times. Using the tether will improve the stability of the child seat and reduce the risk of injury. Check your vehicle owner's manual for tether anchor locations. Only attach the Versa-Tether to anchor points designated to the chosen seating position as indicated by your vehicle owner's manual.</li> <li>• Adjust this child seat to position 1 or 2 and place forward-facing on the vehicle seat (see page 15).</li> <li>• Ensure that no more than 20% or 3 in. (7.6 cm) of the base hangs over the edge of the vehicle seat.</li> </ul>  <p>Install with the lap-shoulder belt as shown above.</p> <p><i>Id.</i> at 28.</p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 16.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Based upon Plaintiff's Amended Complaint, and Disclosure of Asserted Claims and Infringement Contentions and claim charts, and the apparent claim constructions and applications of the claims to Defendants accused products and/or components, as best as they can be deciphered, the reference charted below anticipates or at least renders obvious the asserted claims. These invalidity contentions are not an admission by Defendants that the accused products or components, including any current or past version of these products or components, are covered by, or infringe the asserted claims, particularly when these claims are properly construed and applied. These invalidity assertions are also not an admission that Defendants concede or acquiesce to any claim construction(s) implied or suggested by Plaintiff in its Amended Complaint or the Disclosure of Asserted Claims and Infringement Contentions and claim charts. Nor are Defendants asserting any claim construction positions through these charts, including whether the preamble is a limitation. The portions of the prior art reference cited below are not exhaustive but are exemplary in nature.

The chart below discloses how prior art references identified by Defendants discloses, either expressly or inherently, and/or render obvious each of the asserted claims. The citations provided are exemplary and do not necessarily include each and every disclosure of the limitation in the references. Defendants have endeavored to cite to the most relevant portions of the identified prior art, but other portions of the identified prior art may additionally disclose, either expressly or inherently, and/or render obvious one or more limitations of the asserted claims. Thus, Defendants reserve the right to rely on: (1) uncited portions of the identified prior art; (2) other prior art not identified herein; (3) references that show the state of the art (irrespective of whether such references themselves qualify as prior art to the asserted patents); (4) factual testimony from the inventors or authors of the prior art references, or purveyors of prior art devices; and/or (5) expert testimony, to provide context to or aid in understanding the prior art and the state of the art at the time of the alleged inventions.

The lack of a citation for an element should not be deemed an admission that the element is not disclosed or is not inherent in the reference. When the chart indicates a particular reference discloses or embodies a limitation, the terms "discloses," "disclosed," "embodies," and "embodied" refer to explicit and/or inherent disclosure and/or obvious variations of the actual disclosure. Further, due to the insoluble ambiguity of certain claims and claim limitations, Defendant has, in some instances, used its best efforts to reasonably interpret the claims to fulfill their duties in charting the prior art references.

Where Defendants cite to a particular drawing or figure in the accompanying charts, the citation encompasses the description of the drawing or figure, as well as any text associated with the drawing or figure. Similarly, where Defendants cite to particular text concerning a drawing or figure, the citation encompasses that drawing or figure as well. Certain identified prior art inherently discloses features of the asserted claims. Defendants reserve the right to rely on inherency to demonstrate the invalidity of the asserted claims. Moreover, certain prior art references may inherently disclose certain features of the asserted claims as construed by Plaintiff. Defendants may rely on cited or uncited portions of the prior art, other documents, factual testimony, and expert testimony to establish the inherency of certain features of the prior art to invalidate the asserted claims.

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Defendants contend that one of ordinary skill in the art at the time of the purported invention would have been motivated to combine one or more of the identified references together. In general, a motivation to combine any of the identified references with others exists within the references themselves, as well as within the knowledge of those of ordinary skill in the art. These references identify and address the same technical issues and suggest similar solutions to those issues. Additionally, a person of ordinary skill in the art at the time of the purported invention would have been motivated to combine the prior art references identified by (i) his or her education and experience, (ii) the state of the prior art as a whole, (iii) the nature of the problem to be solved, (iv) common knowledge in the art, (v) common sense, (vi) design incentives, (vii) market forces, and/or (viii) a desire to tailor a solution using all of the skills and knowledge at his or her disposal. *See, e.g., KSR Int'l Co. v. Teleflex, Inc.*, 127 S. Ct. 1727 (2007); *Examination Guidelines for Determining Obviousness Under 35 U.S.C. §103 in View of the Supreme Court Decision in KSR Int'l v. Teleflex, Inc.*, Fed. Reg. 57526 (Oct. 10, 2007).

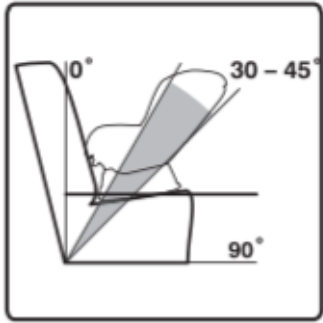


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


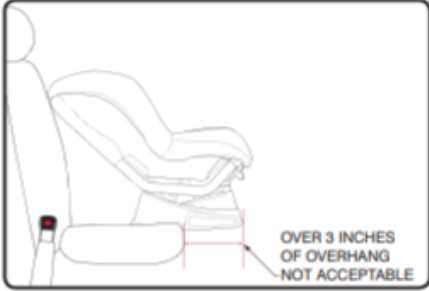

The following list illustrates the grounds for invalidity:

- Britax Child Safety, Inc., *Britax Boulevard 70 CS User Guide*, (2011) [https://us.britax.com/media/7420/p473100\\_r1\\_blvd\\_cs\\_us\\_web.pdf](https://us.britax.com/media/7420/p473100_r1_blvd_cs_us_web.pdf), *Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs*, YouTube (Jan. 6, 2011) <https://www.youtube.com/watch?v=OrL4oZaEwuk>, *Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs*, YouTube (Jan. 6, 2011), <https://www.youtube.com/watch?v=I1gD5S-9NFE&t=59s>, (collectively, “Boulevard 70 CS”) anticipates claims 1-15.
- *Boulevard 70 CS* renders obvious claims 1-15.
- *Boulevard 70 CS* in combination with U.S. Patent No. 6,508,510 B2 (“*Yamazaki*”), Japanese Laid-open Patent Publication No. H5-185869 (“*Washimi*”), European Patent Application No. EP0822115A2 (“*Wetter*”), the Uppa Baby Mesa Instruction Manual (“*Uppa Baby Mesa*”), the Britax B-Safe 35 User Guide (“*B-Safe 35*”) U.S. Patent No. 8,322,788 B2 (“*Williams*”) and/or the Graco Smart Seat Owner’s Manual (“*Graco Smart Seat*”) renders obvious claims 1-15.

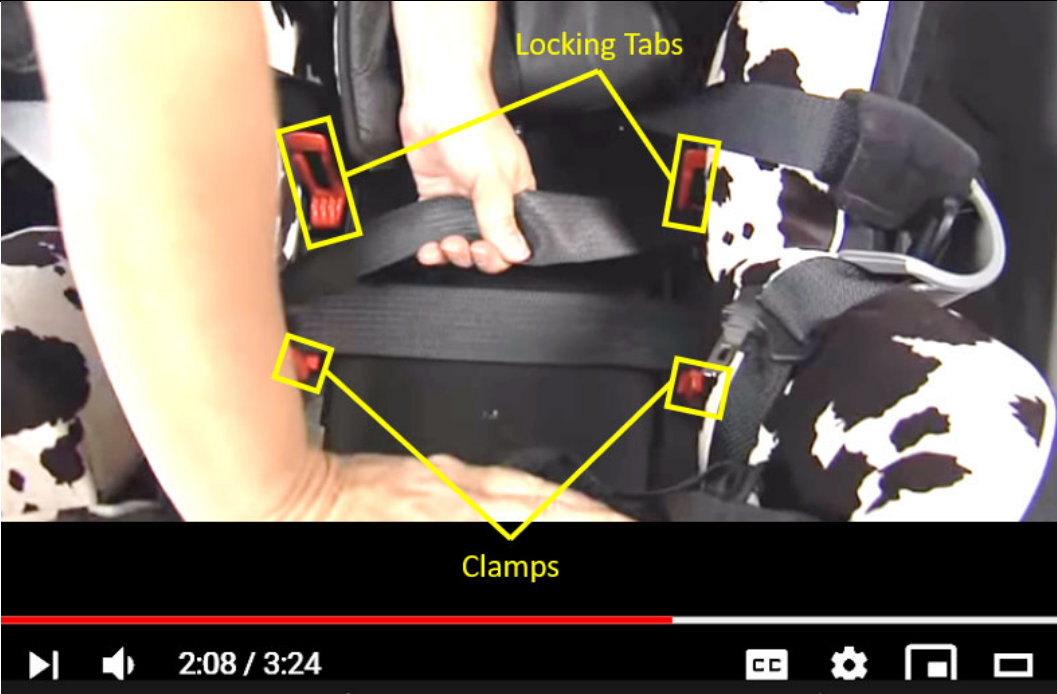
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
[1(p)] A child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation by a belt of the vehicle seat, the child seat comprising:	<p><i>Boulevard 70 CS</i> discloses or renders obvious a child seat configured to be secured to a vehicle seat in both a rear-facing and front-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 15; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p>  <p><i>Id.</i>, p. 15.</p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>UP TO 3 INCHES OF OVERHANG ACCEPTABLE</p> <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p>OVER 3 INCHES OF OVERHANG NOT ACCEPTABLE</p> <p><i>Unacceptable overhang</i></p> </div> </div> <div style="text-align: right; margin-top: 10px;">  </div> <p style="text-align: right; margin-top: 10px;"><i>Id.</i>, p. 15.</p>

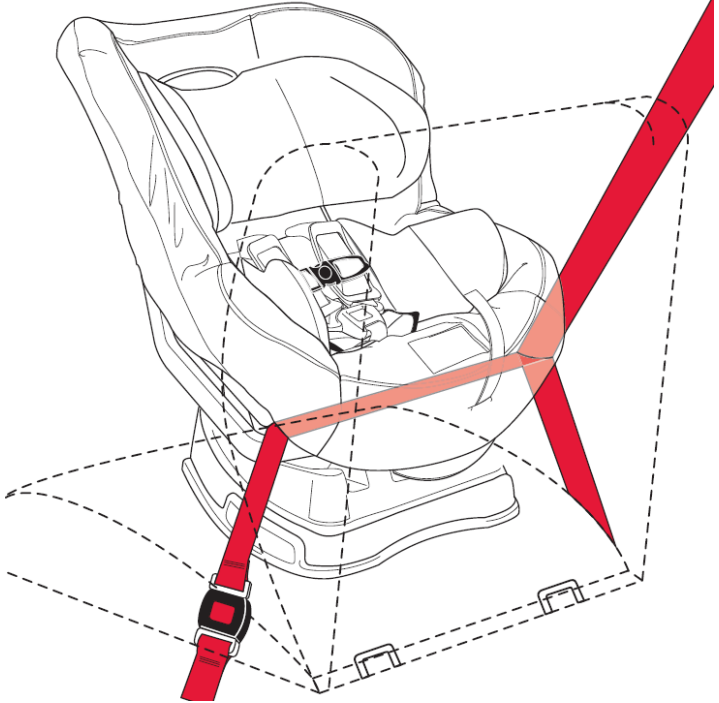
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

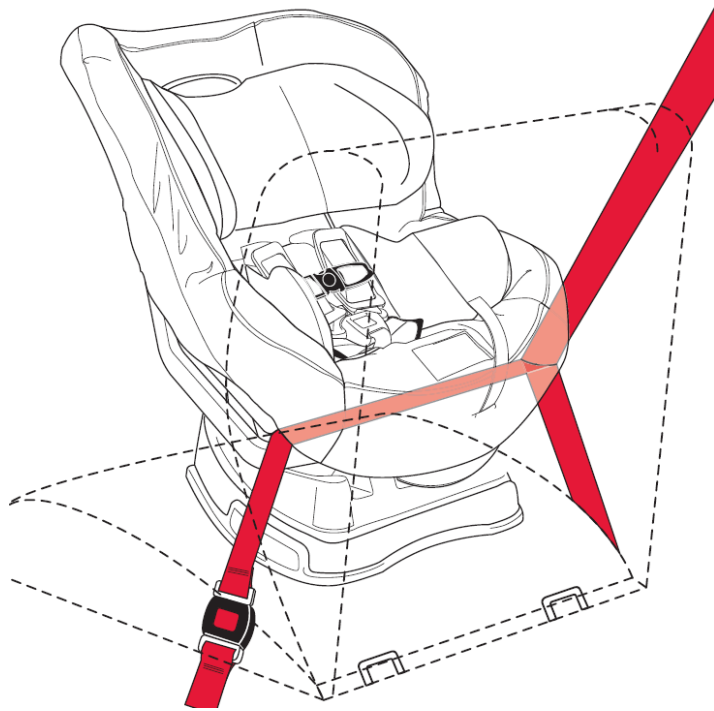
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(a)(1)] a seat base comprising a seat portion, a backrest portion,	<i>Boulevard 70 CS discloses or renders obvious a seat base comprising a seat portion and a backrest portion. Boulevard 70 CS User Guide, p. 22.</i>

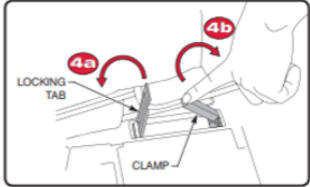


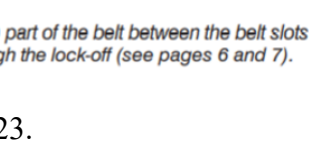
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Id.</i>, p. 22.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(a)(2)] first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions,	<p><i>Boulevard 70 CS</i> discloses or renders obvious first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions. <i>Boulevard 70 CS User Guide</i>, p. 22.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Id.</i>, p. 22.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(a)(3)] a first belt path generally at a middle of the seat portion in a	<p><i>Boulevard 70 CS</i> discloses or renders obvious a first belt path generally at a middle of the seat portion in a forward and rearward direction. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

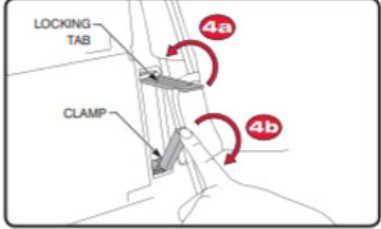
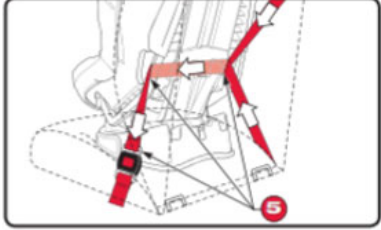

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
forward and rearward direction,	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Id.</i>, p. 23.</p>



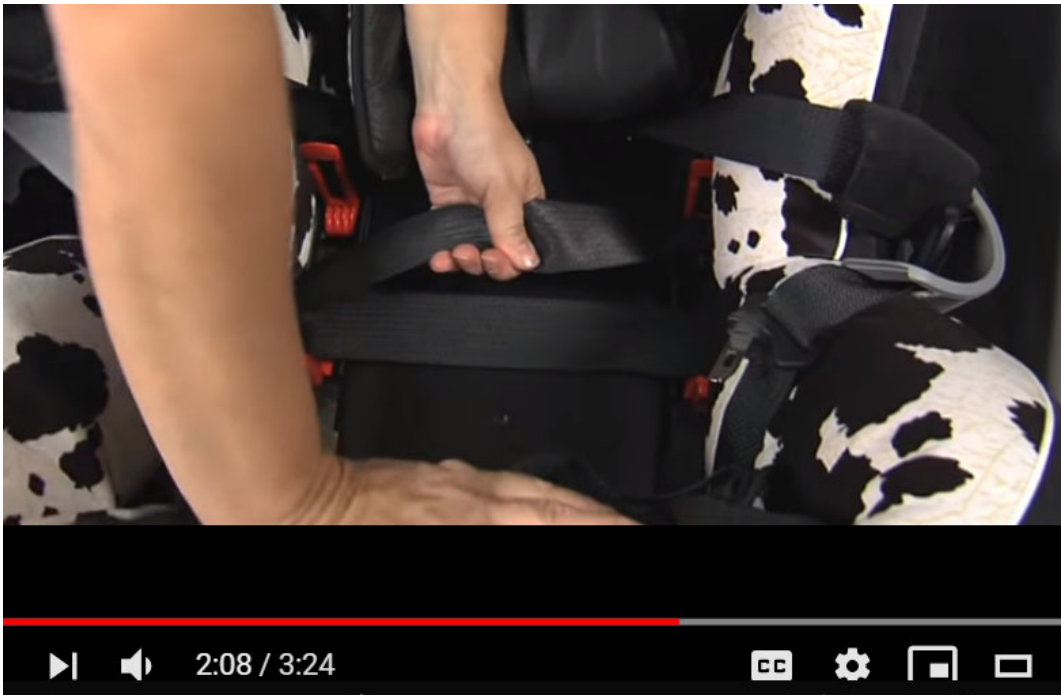
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(a)(4)] and a second belt path generally at an intersection of the seat and backrest portions; and	<p><i>Boulevard 70 CS</i> discloses or renders obvious a second belt path generally at an intersection of the seat and backrest portions. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

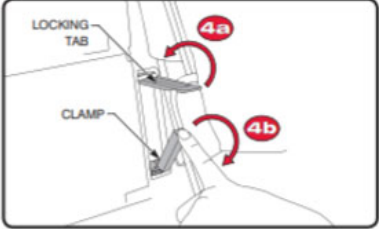
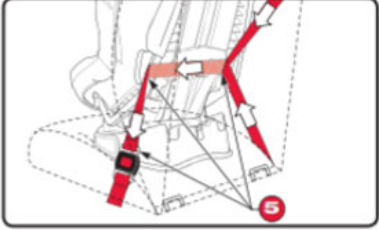

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p> <p><i>Id.</i>, p. 29.</p>   

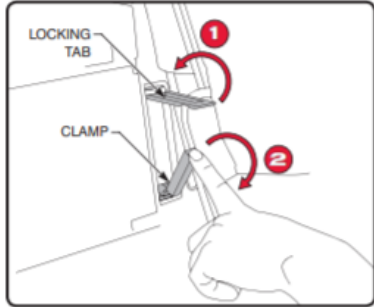
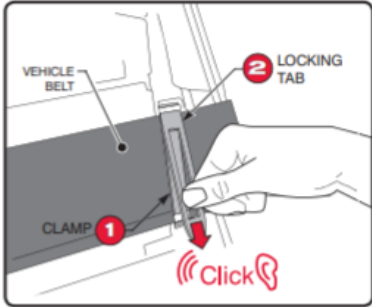

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(b)(1)] a tensioning mechanism attached to the seat base to be movable between a first position and a second position,	<p><i>Boulevard 70 CS discloses or renders obvious a tensioning mechanism attached to the seat base to be movable between a first position and a second position. Boulevard 70 CS User Guide, p. 29; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p> <p><i>Id.</i>, p. 29.</p>   

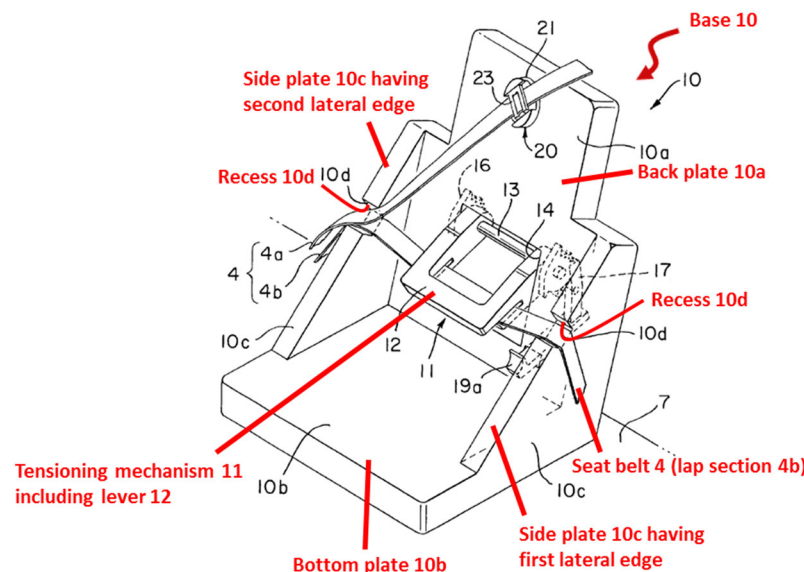
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p> 14</p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

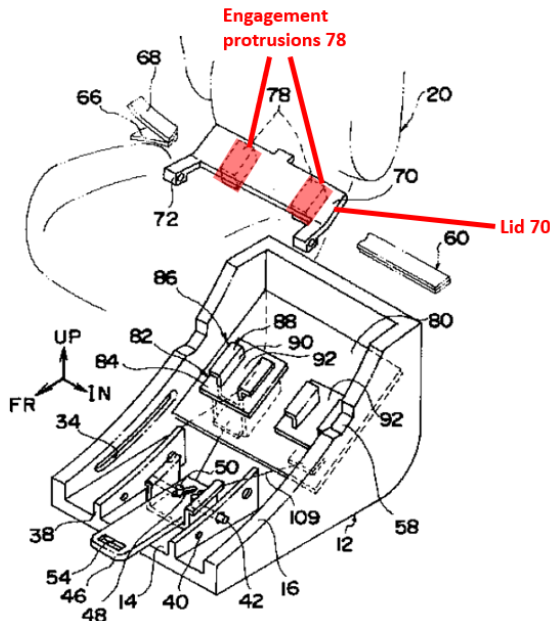
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>’s tensioning mechanism. Furthermore, although <i>Yamazaki</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Yamazaki</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Yamazaki</i> discloses:</p> <p>“The base 10 is fastened to the passenger seat 7 by a lap-and-diagonal seat belt 4. The seat belt 4 has a diagonal section 4a extending between a tongue plate 5 (FIG. 5) to be engaged with a latch</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>6 (FIG. 5) connected to the floor of the vehicle and a retractor (not shown), and a lap section 4b extending between the tongue plate 5 (FIG. 5) and an anchor (fixed member) 9 (FIG. 5).” <i>Yamazaki</i>, 3:30-36.</p> <p>“Step 1: The base 10 is set on the passenger seat 7 of the vehicle. Step 2: The tongue plate 5 of the seat belt 4 is engaged with the latch 6 with the lap section 4b of the seat belt 4 extended under the lever 12 of the seat belt tightening mechanism 11.” <i>Id.</i>, 4:27-32.</p>  <p style="text-align: center;"><b>FIG. 1</b> <i>Id.</i>, Fig. 1.</p>



## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

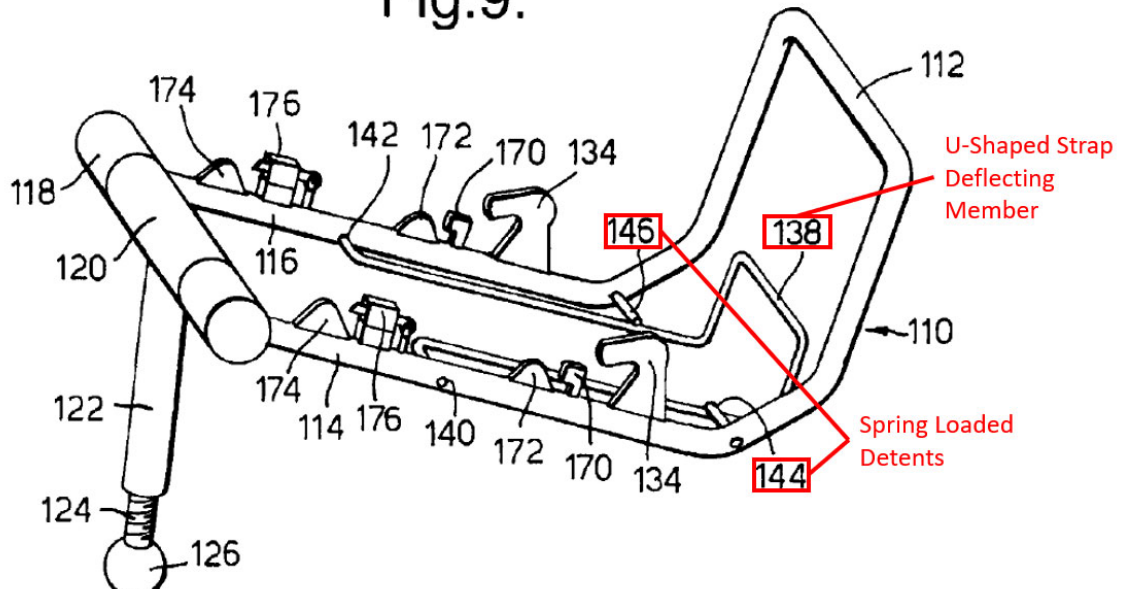
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>In another alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Washimi</i>’s tensioning mechanism. Furthermore, although <i>Washimi</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Washimi</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Washimi</i> discloses:</p> <p>“In the straddle part 56, the webbing 60 is positioned with the lap webbing 66 and shoulder webbing 68 stacked together in a state where the tongue plate 62 is engaged with the buckle device 64.” <i>Washimi</i>, ¶[0023].</p>  <p><i>Id.</i>, Fig. 1 (annotated).</p>



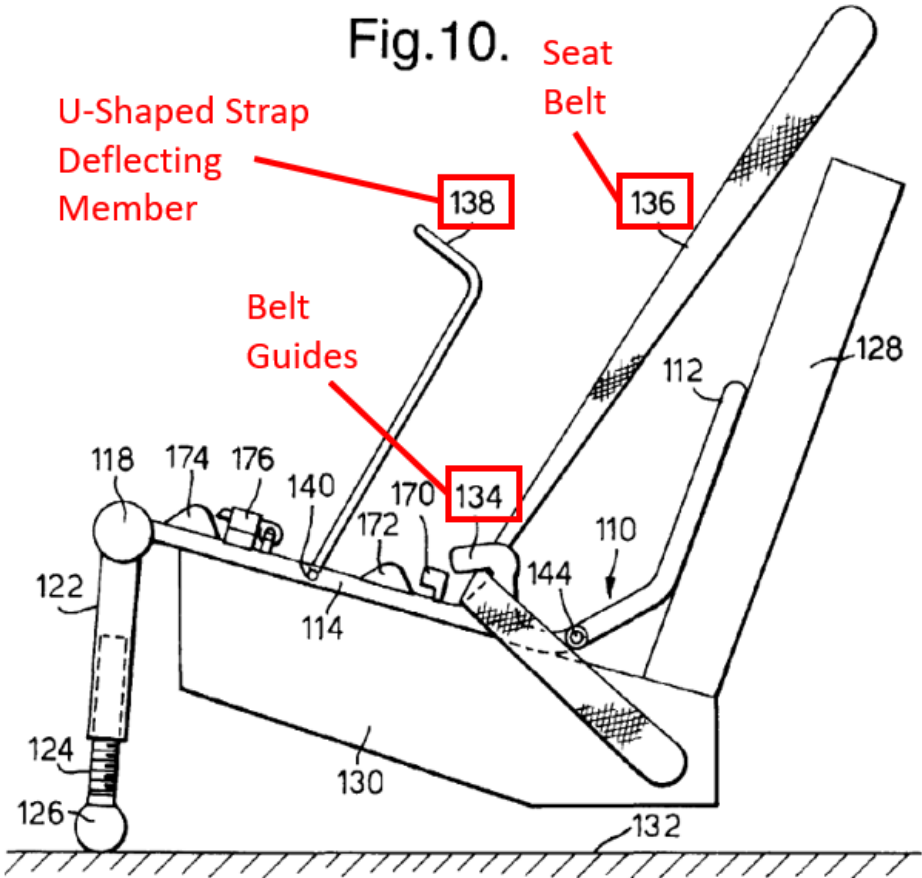
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

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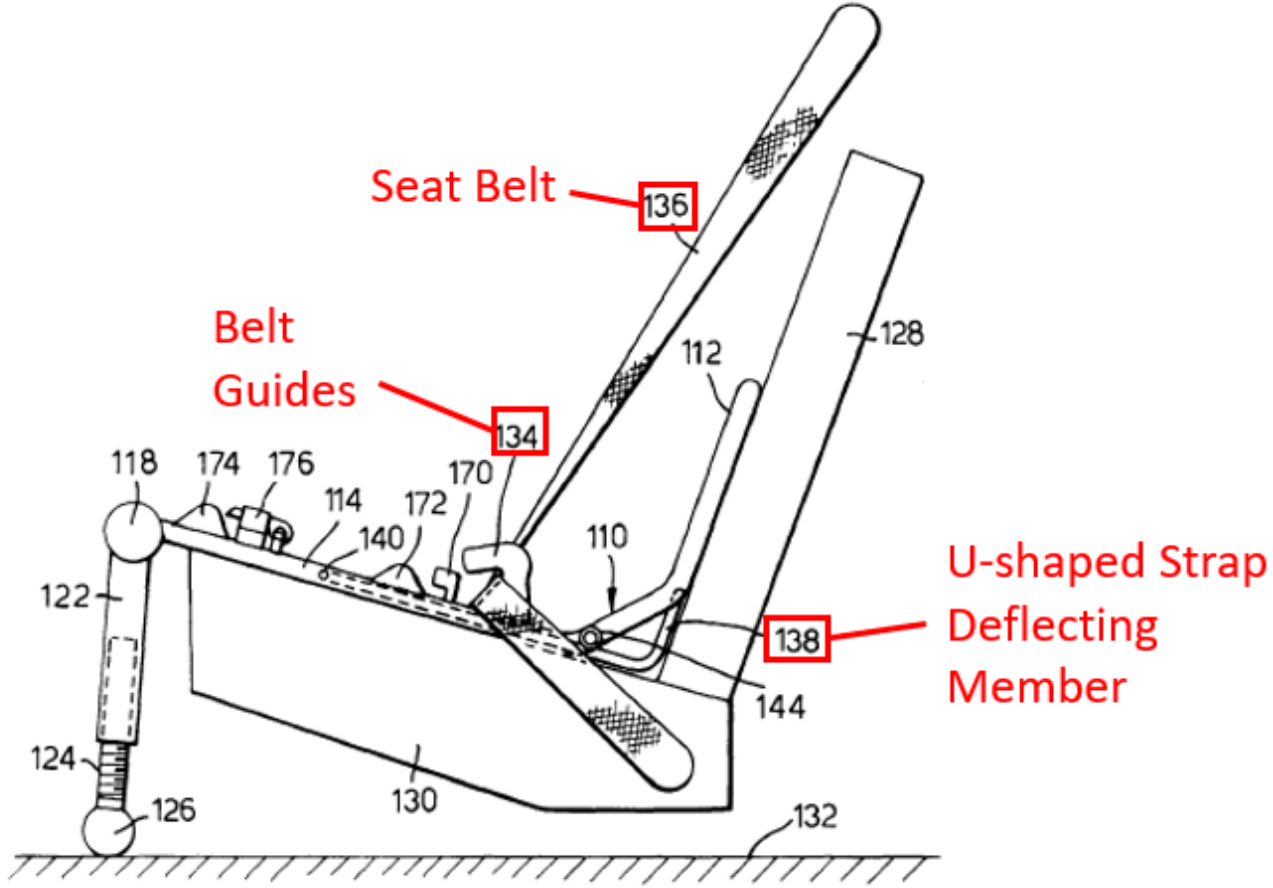
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>the side limbs 114 and 116 of the base member, is pivoted downwardly from the position shown in Figure 10 to the position shown in Figure 11 in which it deflects the adult seat belt 136 downwardly between the belt guides 134, thereby tightening the belt 136 and compressing the springs of the seat cushion 130 of the vehicle seat. The deflection member 138 is held in the position shown in Figures 9 and 11 (in which it lies substantially parallel to the limbs 114 and 116 of the base member) by springloaded detents 144 and 146 on the base member 110 adjacent to the junctions between the central portion 112 and the end portions 114 and 116 respectively.”  <i>Wetter</i>, 5:6-23.</p> <p style="text-align: center;"><b>Fig.9.</b></p>  <p style="text-align: right;">U-Shaped Strap Deflecting Member</p> <p style="text-align: right;">Spring Loaded Detents</p> <p style="text-align: center;"><i>Id.</i>, Fig. 9 (annotated).</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p data-bbox="1115 370 1276 423">Fig.10.</p>  <p data-bbox="827 451 1079 581">U-Shaped Strap Deflecting Member 138</p> <p data-bbox="1310 391 1381 472">Seat Belt 136</p> <p data-bbox="1016 646 1129 727">Belt Guides 134</p> <p data-bbox="1094 1263 1394 1292"><i>Id.</i>, Fig. 10 (annotated).</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

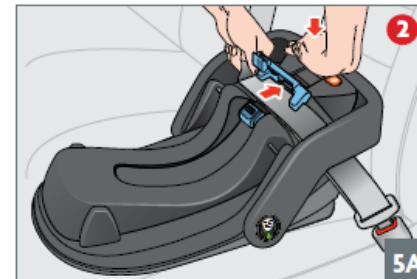
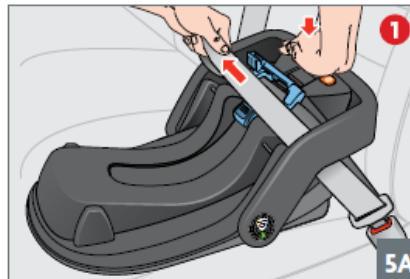
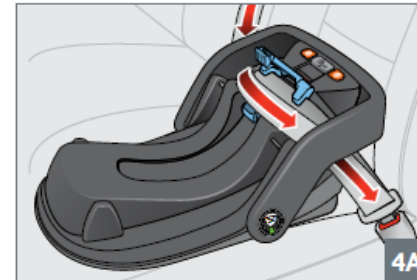
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1087 1304 1398 1336"><i>Id.</i>, Fig. 10 (annotated).</p> <p data-bbox="575 1377 1902 1450">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p><i>CS</i> with <i>Uppa Baby Mesa</i>'s tensioning mechanism. Furthermore, although <i>Uppa Baby Mesa</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Uppa Baby Mesa</i>'s tensioning mechanism into <i>Boulevard 70 CS</i>'s child seat. For example, literature disclosing the <i>Uppa Baby Mesa</i> discloses:</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504****SECURING THE BASE (LAP AND SHOULDER BELT INSTALLATION)**

**STEP 4A:** Route the vehicle belt through the belt path while guiding the lap portion of the belt as close as possible to the top of the lock-off where the door hinges. Buckle the vehicle belt.



**STEP 5A:** Hold shoulder portion of belt above base. With one hand push down base in the direction of the seat bight (crease of seat) and hold firm as you pull shoulder belt **1**. While holding taut, slide shoulder belt back through the belt path as close as possible to the top of the lock-off **2**.

**NOTE: TIGHTNESS INDICATOR SHOULD BE GREEN.**



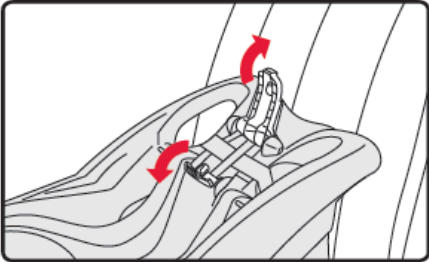
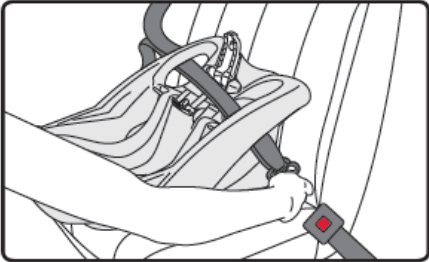

**STEP 6A:** Close the lock-off door.

**NOTE:** Check that the belt doesn't move more than 1 inch at belt path. If you are having trouble achieving a secure installation in the center seat position, please install using the locking clip (pg. 28).



BASE INSTALLATION WITH VEHICLE SEAT BELT

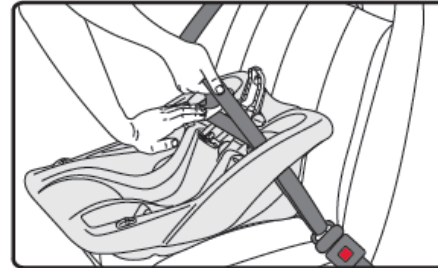
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p data-bbox="963 342 1524 375">Uppa Baby Mesa Instruction Manual, p. 23.</p> <p data-bbox="575 415 1913 630">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>B-Safe 35</i>’s tensioning mechanism. Furthermore, although <i>B-Safe 35</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>B-Safe 35</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Boulevard 70 CS</i> discloses:</p> <div data-bbox="831 672 1272 841"> <ul style="list-style-type: none"> <li>• <i>Place the base in the desired location on the vehicle seat and open the upper and lower portions of the lock-off.</i></li> <li>• <i>Pull the vehicle seat belt out.</i></li> </ul> </div> <div data-bbox="1289 675 1715 935">  </div> <div data-bbox="831 951 1268 1221"> <ul style="list-style-type: none"> <li>• <i>Ensure that the vehicle seat belt is not twisted and then route the vehicle belt under and through the first belt guide, through the open lock-off and down through the second belt guide.</i></li> <li>• <i>Buckle the vehicle seat belt.</i></li> </ul> </div> <div data-bbox="1289 951 1715 1211">  </div> <div data-bbox="747 1243 827 1299">  </div> <p data-bbox="1016 1312 1478 1344">Britax B-Safe 35 User Guide, p. 16.</p>

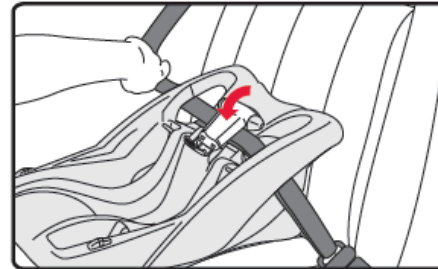
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

**Installing the Base**

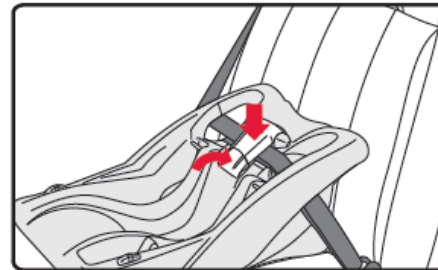
- *Press the base firmly into the vehicle seat while removing all slack from first the lap portion and then the shoulder portion of the vehicle seat belt.*



- *Hold the vehicle belt tight and close the upper portion of the lock-off.*



- *Press firmly on the upper portion of the lock-off and close the lower portion to secure.*



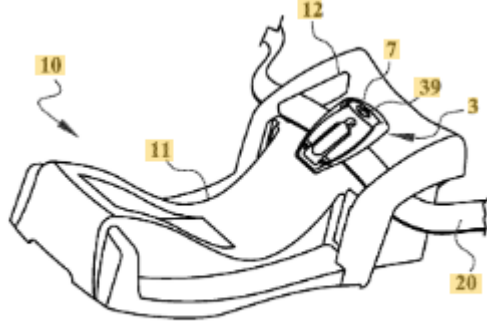
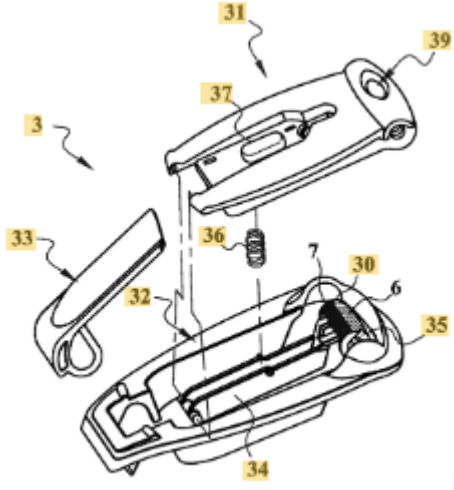
- *Verify that the vehicle belt is tight and that the base is secure. The base is secure when it moves less than 1 inch (2.5 cm) front-to-back or side-to-side at the vehicle belt path.*
- *Correct recline angle is achieved when the green marker on each recline angle indicator is visible between the two lines.*



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p><i>Id.</i>, p. 17.</p> <p>In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Williams</i>’s tensioning mechanism. Furthermore, although <i>Williams</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Williams</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Williams</i> discloses:</p> <p>“Referring to FIG. 1, the base 10 may be formed integrally in one piece or an assembly of multiply piece, having a curved supporting surface 11 for support a infant travel seat thereon and a pair of side guiding openings 12 for allowing a belt passing therethrough so as to secure the base 10 to the vehicle seat. Referring to FIGS. 2 and 3, the biting compartment 32 is formed on the base 10 between the pair of side guiding openings 12 where the belt 20 could pass is passing thereover. The covering plate 31 has one end coaxial with the colored rotor 35 and pivoted to one end of the biting compartment 32 for closing the biting compartment 32 when being rotated to a closed position, and another end pivoted with a rotatable depressor 34 for pressing the belt 20 into the biting compartment 32 when the covering plate 31 is rotated to and positioned in the closed position. [P]referably, a resilient element 36 may be mounted between the covering plate 31 and the rotatable depressor 34, so as to keep the rotatable depressor 34 in an opened position. In one embodiment, the resilient element 36 is a compression spring for biasing the rotatable depressor 34 downward and keeping in the opened position. When the covering plate 31 is carrying the rotatable depressor 34 to press the belt 20, it would compress the resilient element 36 and cause the rotatable depressor 34 to rotate and close to the covering plate 31 to a closed position.” <i>Id.</i>, 2:49-3:7.</p> <p>“Referring to FIGS. 5 and 6, before tying the base <b>10</b> to a vehicle seat, the belt <b>20</b> is passing through the pair of side guiding openings <b>12</b> and secure its free end to an anchor which is</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>mounted within the vehicle seat. By this way, may secure the base <b>10</b> to the vehicle seat tightly.” <i>Id.</i>, 3:41-45.</p> <p>“In order to inhibit the sliding between the base <b>10</b> and belt <b>20</b>, the user may rotate the covering plate <b>31</b> to close the biting compartment <b>32</b>, thus would carry the rotatable depressor <b>34</b> to press the belt <b>20</b> into the biting compartment <b>32</b>. After being closed the covering plate <b>31</b>, the user may rotate the holding plate <b>33</b> to engage and lock the covering plate <b>31</b> in the closed position.” <i>Id.</i>, 3:16-52.</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p style="text-align: center;"><i>Id.</i>, FIGS. 1, 2.</p>

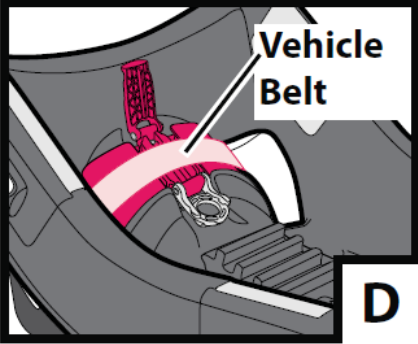
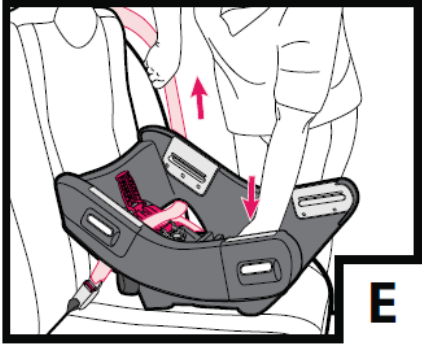
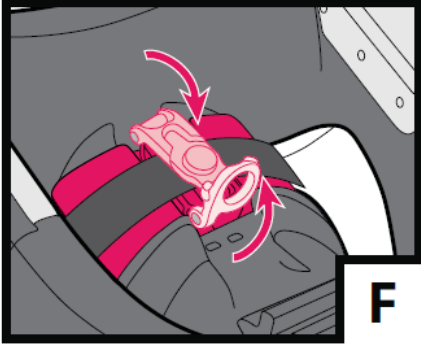

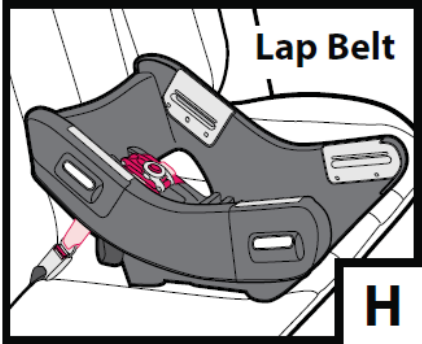
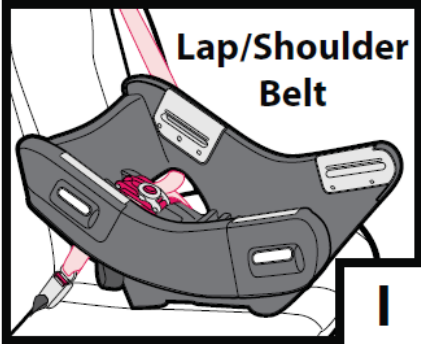
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p style="text-align: center;"><b>FIG. 5</b></p> <p style="text-align: center;"><i>Id.</i>, FIG. 5.</p> <p>In a further alternative, to the extent <i>the Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Graco Smart Seat</i>’s tensioning mechanism. Furthermore, although <i>Graco Smart Seat</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Graco Smart Seat</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Graco Smart Seat</i> discloses:</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>When using the vehicle seat belts to install the base, the lock-off is <b>ALWAYS</b> used to secure both belts of the lap or lap/shoulder belt.</p> <ol style="list-style-type: none"> <li>1. Position base in vehicle seat as shown <b>C</b>.</li> <li>2. Open the lock-off and route the vehicle belt through the belt path and over the lock-off <b>D</b>.</li> <li>3. Buckle seat belt. Pull up on shoulder belt while pushing down on base to tighten <b>E</b>.</li> <li>4. Close lock-off <b>F</b>.</li> <li>5. Test base for secure installation by moving front to back and left to right at the belt path <b>G</b>. Base should not move more than 1 inch ( 2.54 cm). If belt loosens or lengthens, repeat procedure.</li> </ol> <p>Lap Belt <b>H</b> and Lap/Shoulder Belt <b>I</b> should appear as shown when installed.</p> <p style="text-align: center;"><b>30</b></p> <p style="text-align: center;"><i>Graco Smart Seat Owner's Manual, p. 30.</i></p>

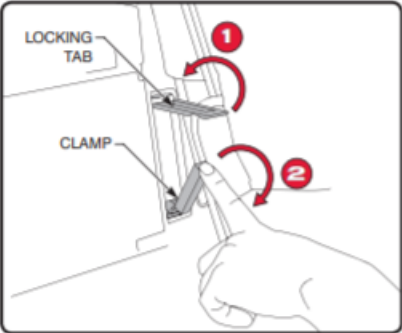
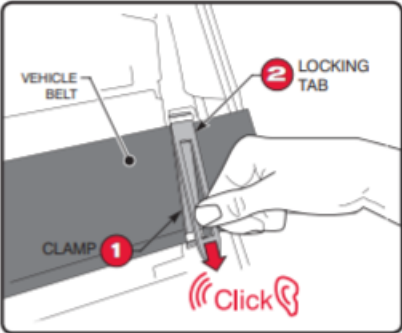

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
	Prior Art
	<div data-bbox="585 347 1003 688">  <p><b>D</b></p> </div> <div data-bbox="1035 347 1453 688">  <p><b>E</b></p> </div> <div data-bbox="1484 347 1902 688">  <p><b>F</b></p> </div> <div data-bbox="585 699 1003 1040">  <p><b>G</b></p> </div> <div data-bbox="1035 699 1453 1040">  <p><b>H</b></p> </div> <div data-bbox="1484 699 1902 1040">  <p><b>I</b></p> </div> <p style="text-align: center;"><b>31</b></p> <p style="text-align: center;"><i>Id.</i>, p. 31.</p> <p>One of ordinary skill in the art would have been motivated to combine <i>the Boulevard 70 CS</i> with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i>, and/or <i>Graco Smart Seat</i> because these references teach systems securing child seats to vehicle seats using securing mechanisms. The <i>Boulevard 70 CS</i> uses a tensioning mechanism to ensure “that the child seat cannot be moved front to back or side to side more than 1 in. (2.5 cm) at the belt path. If the child seat is not secure, repeat installation or use a different seating location.” <i>Boulevard CS 70 User Guide</i>, p. 21, 23, 25, 27, 29, 31.</p>

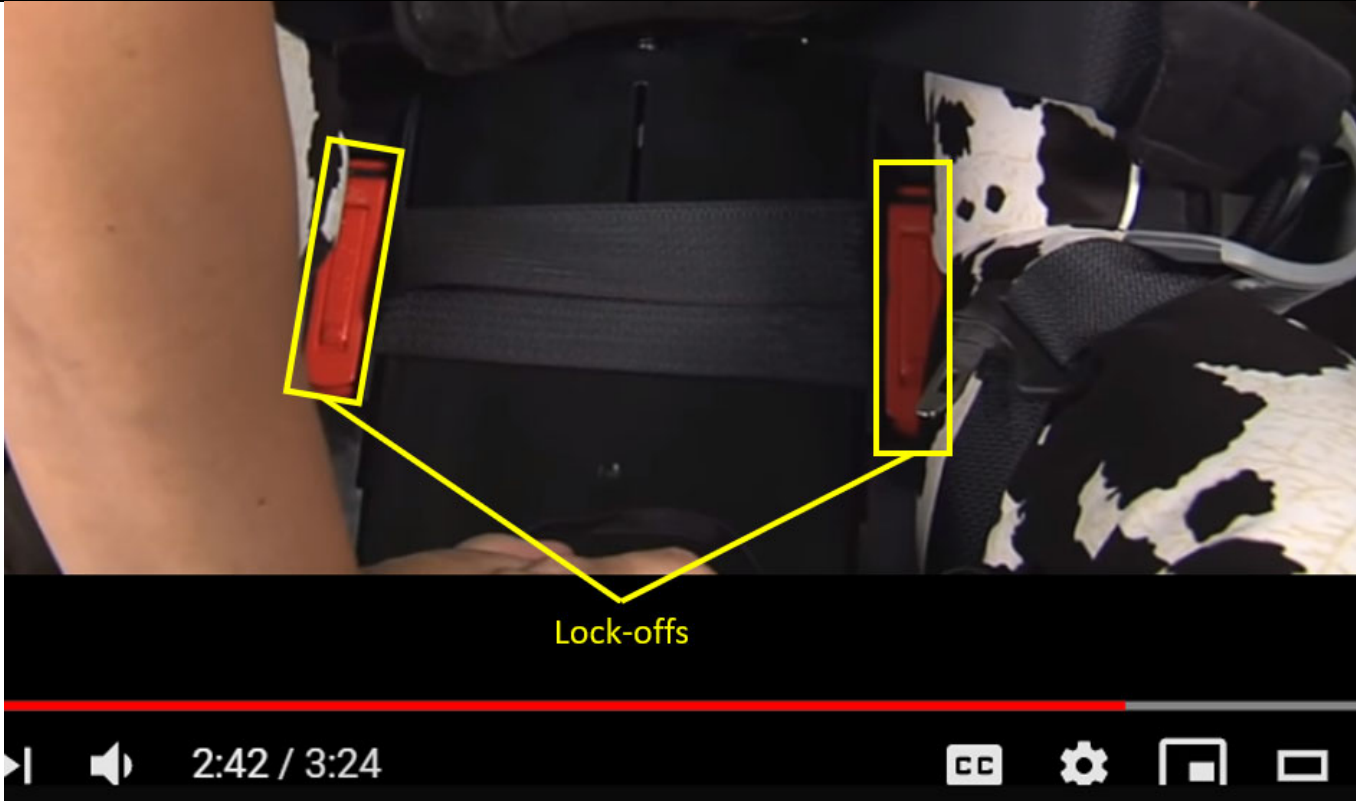
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p>As identified, the installation of <i>Boulevard 70 CS</i>'s child seat can sometimes result in loose installations. <i>Id.</i> Therefore, a person of ordinary skill in the art would have looked to improve <i>Boulevard CS 70</i>'s locking tabs with one of the tensioning mechanisms disclosed in <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(b)(2)] the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism rotates between the first position and the second position pivotally about the axis, and	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism rotates between the first position and the second position pivotally about the axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

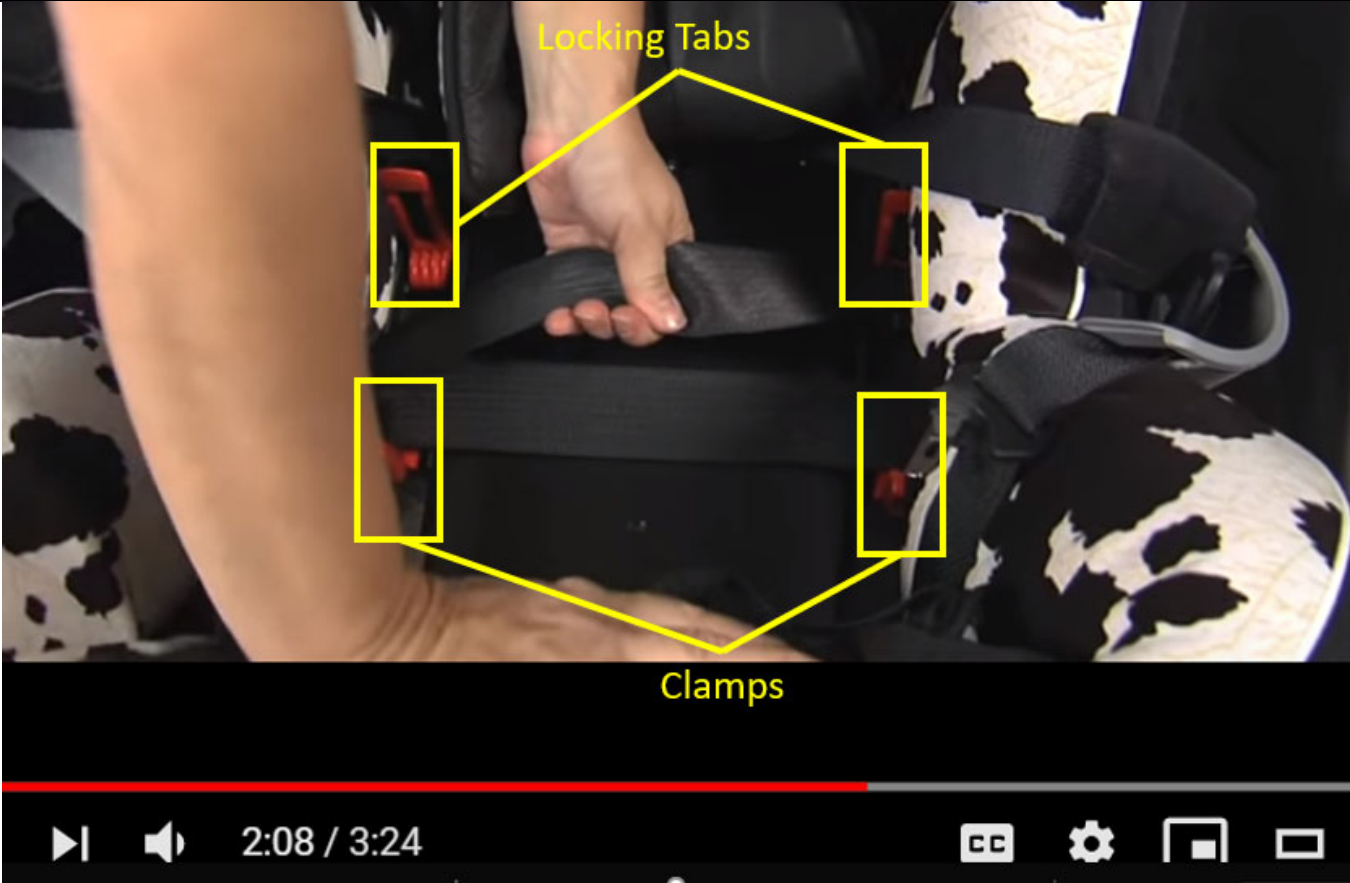
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p data-bbox="795 380 1142 410"><b>Using the Lock-Offs</b></p> <p data-bbox="795 440 1646 493"><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <div data-bbox="795 534 921 565"> <p><b>To Open:</b></p>  <ol data-bbox="827 930 1108 984" style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1255 534 1388 565"> <p><b>To Close:</b></p>  <ol data-bbox="1287 930 1640 1068" style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> <div data-bbox="772 1117 882 1170">  </div> <p data-bbox="1182 1255 1308 1286"><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

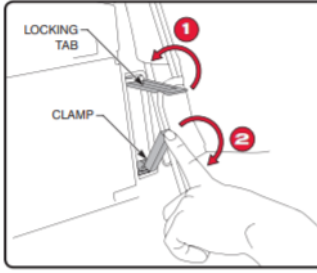
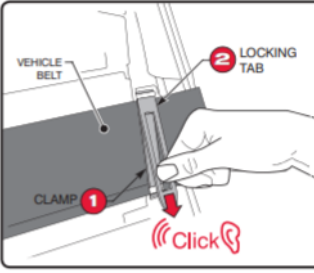
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>



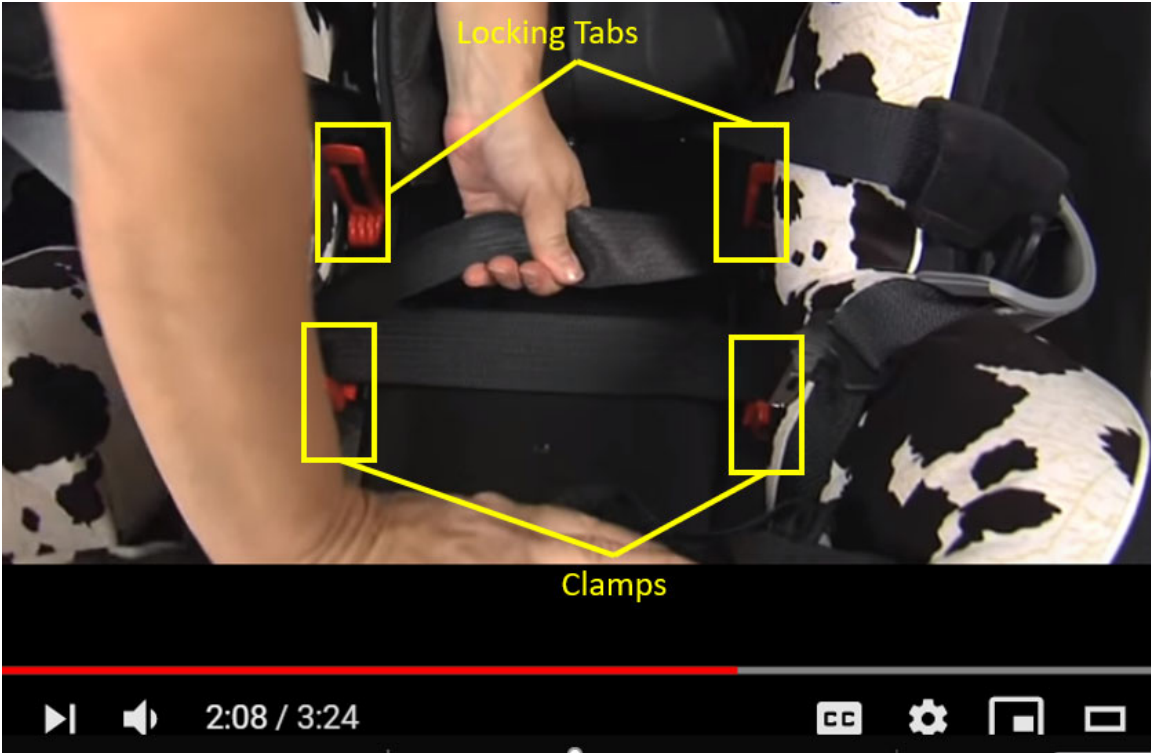
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1108 354 1323 393">Locking Tabs</p> <p data-bbox="1228 998 1354 1037">Clamps</p> <p data-bbox="699 1221 1892 1289"><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p data-bbox="575 1328 1877 1396"><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>

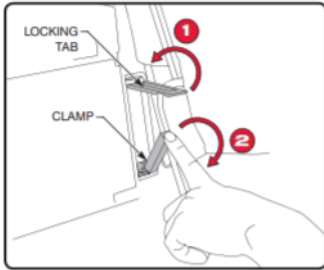
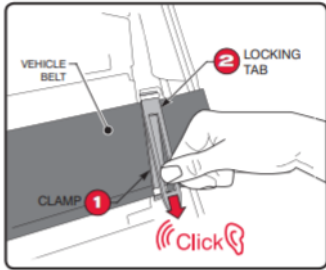
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>[1(b)(3)] wherein the tensioning mechanism has a first lateral edge surface and a second lateral edge surface, the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism has a first lateral edge surface and a second lateral edge surface, the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off</i>.</p> <div data-bbox="890 532 1591 1172"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div data-bbox="890 662 1222 1026"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1264 662 1591 1091"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> <div data-bbox="877 1133 970 1172"> <p>14</p> </div> </div> <p><i>Id.</i>, p. 14.</p>

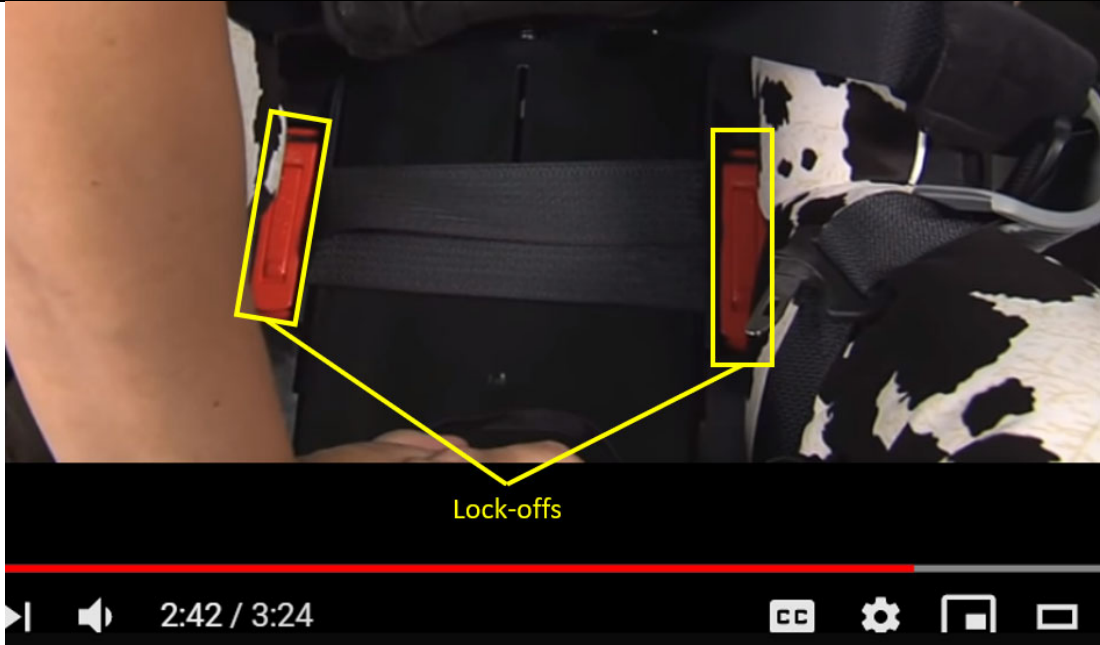
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(b)(4)] wherein in the first position, the tensioning mechanism is	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the first position, the tensioning mechanism is substantially adjacent to the seat base. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off</i>.</p>

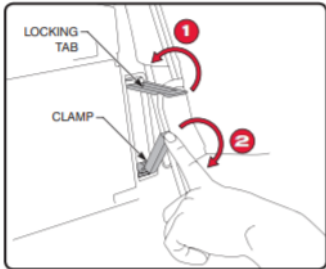
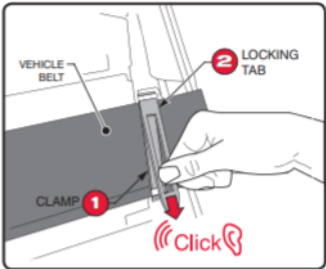

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
substantially adjacent to the seat base, and	<p data-bbox="898 391 1178 418"><b>Using the Lock-Offs</b></p> <p data-bbox="898 440 1583 487"><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div data-bbox="898 516 999 544"> <p><b>To Open:</b></p>  <ol data-bbox="921 833 1150 880" style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1268 516 1373 544"> <p><b>To Close:</b></p>  <ol data-bbox="1291 833 1577 945" style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> <p data-bbox="879 987 966 1026">14</p> <p data-bbox="1184 1037 1310 1071"><i>Id.</i>, p. 14.</p>

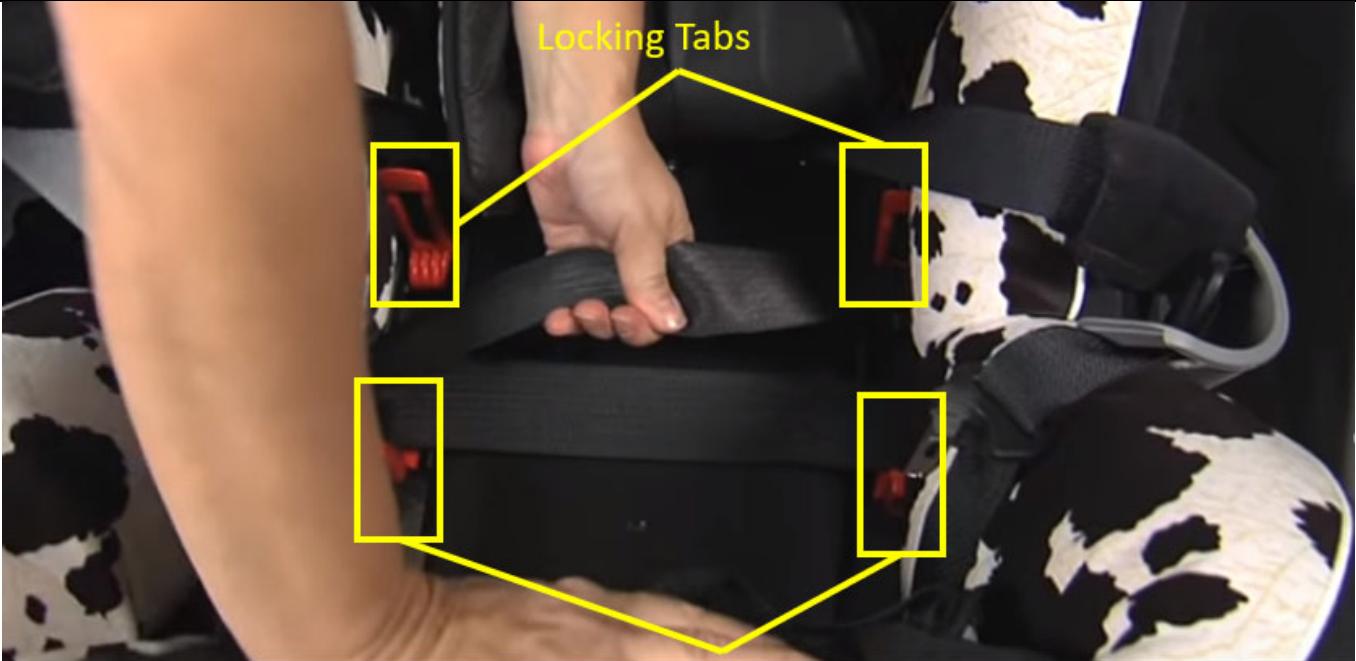
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(b)(5)] wherein in the second position, the tensioning mechanism is at least partly displaced from the seat base in order to enable at least one of the first belt path or the	<p><i>Boulevard 70 CS discloses or renders obvious the seat base is configured to receive a belt of the vehicle seat in an untensioned state to secure the child seat to the vehicle seat in an untensioned configuration. Boulevard 70 CS User Guide, p. 14; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

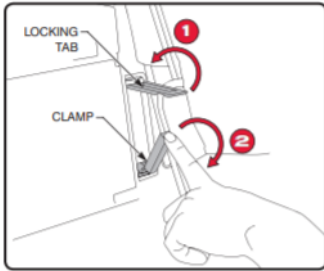
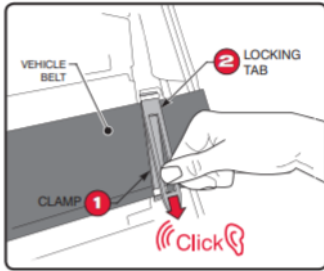

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
second belt path to receive the belt;	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;">    <i>Boulevard CS 70 User Guide, p. 14.</i> </p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1108 354 1323 393">Locking Tabs</p> <p data-bbox="1228 1003 1354 1042">Clamps</p> <p data-bbox="625 1156 997 1198">2:08 / 3:24</p> <p data-bbox="697 1221 1894 1295"><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p data-bbox="575 1334 1879 1399"><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>




**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

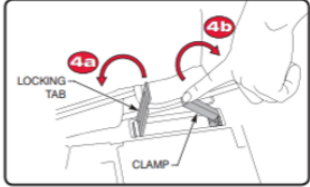


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>[1(c)(1)] wherein the first belt path is configured to allow a user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path is configured to allow a user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;"></p> <p style="text-align: right;"><i>Id.</i>, p. 14.</p>



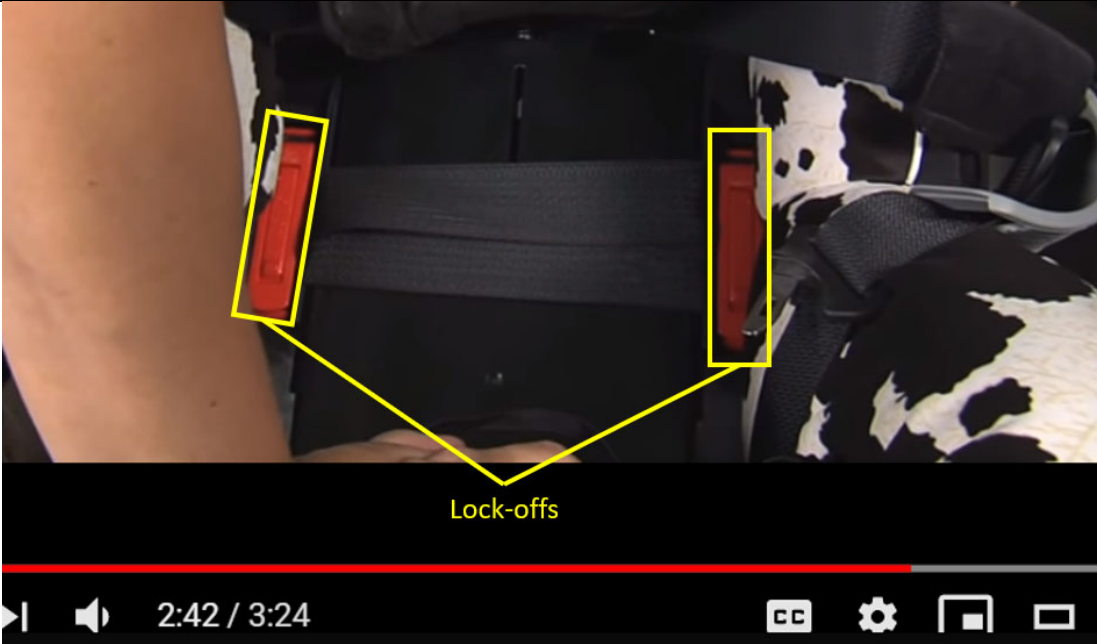
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(c)(2)] wherein the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism is movable downwardly and forwardly to a first position substantially adjacent to the seat base and upwardly and rearwardly to a second position displaced therefrom. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

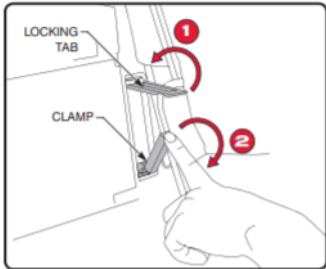
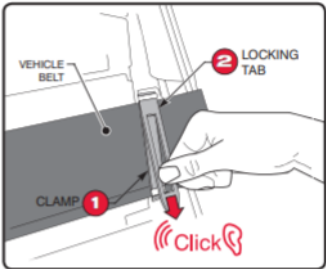

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
forward-facing orientation, and	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p><i>Id.</i>, p. 23.</p>   

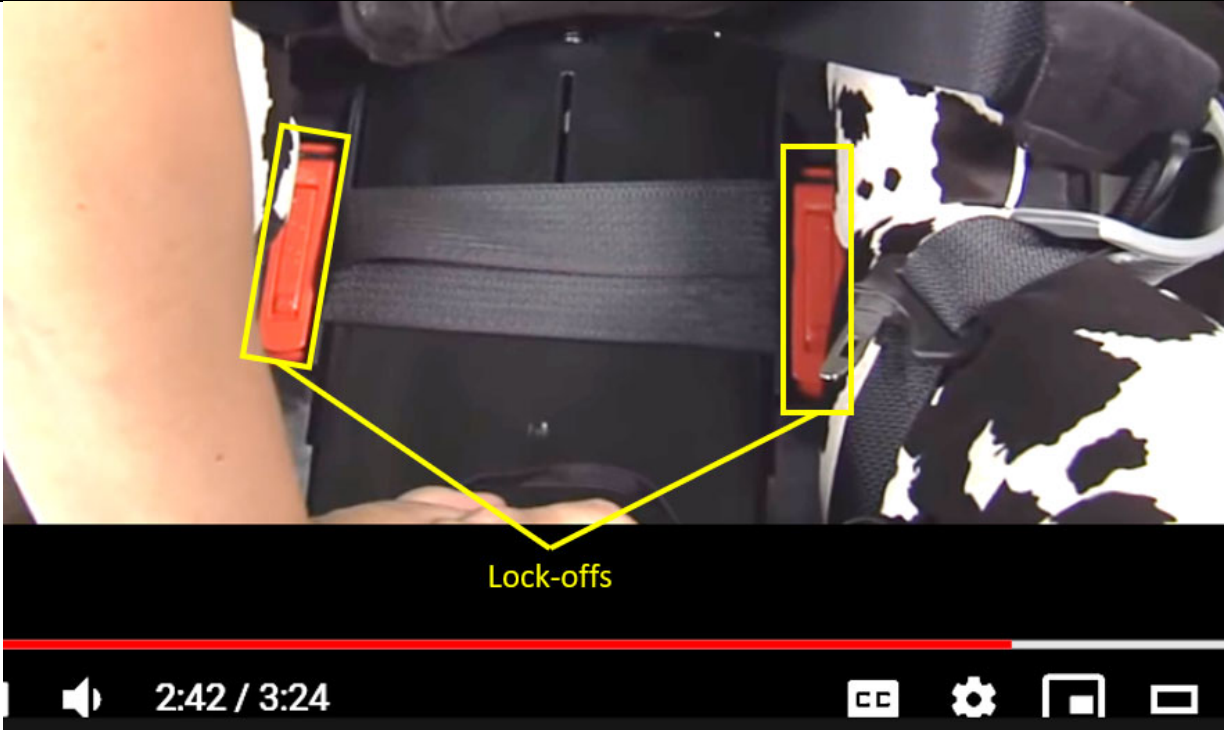
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(d)] wherein in each of the forward or rear-facing orientations, the first and second lateral edge surfaces of respective different portions of the tensioning mechanism	<p><i>Boulevard 70 CS discloses or renders obvious that in each of the forward or rear-facing orientations, the first and second lateral edge surfaces of respective different portions of the tensioning mechanism displace the belt to apply tension to the belt. Boulevard 70 CS User Guide, p. 14; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs; Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
displace the belt to apply tension to the belt.	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;">    <i>Boulevard 70 CS User Guide, p. 14.</i> </p>

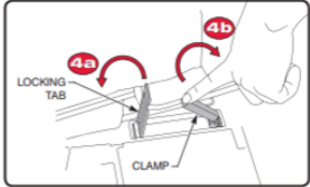


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
2. The child seat according to claim 1,	<i>Boulevard 70 CS</i> discloses or renders obvious the first belt path extending transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base. <i>Boulevard 70 CS User Guide</i> ,

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.</p>	<p>p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div> <p style="text-align: right;"><i>Boulevard 70 CS User Guide, p. 23.</i></p>

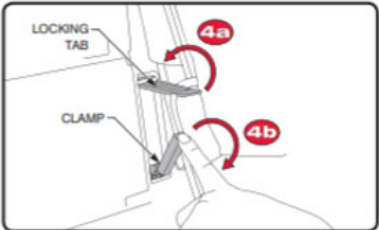
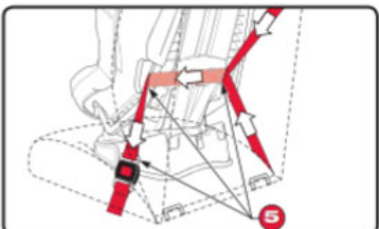

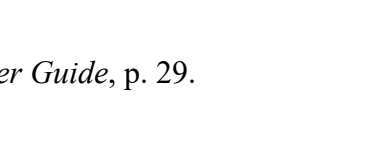


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

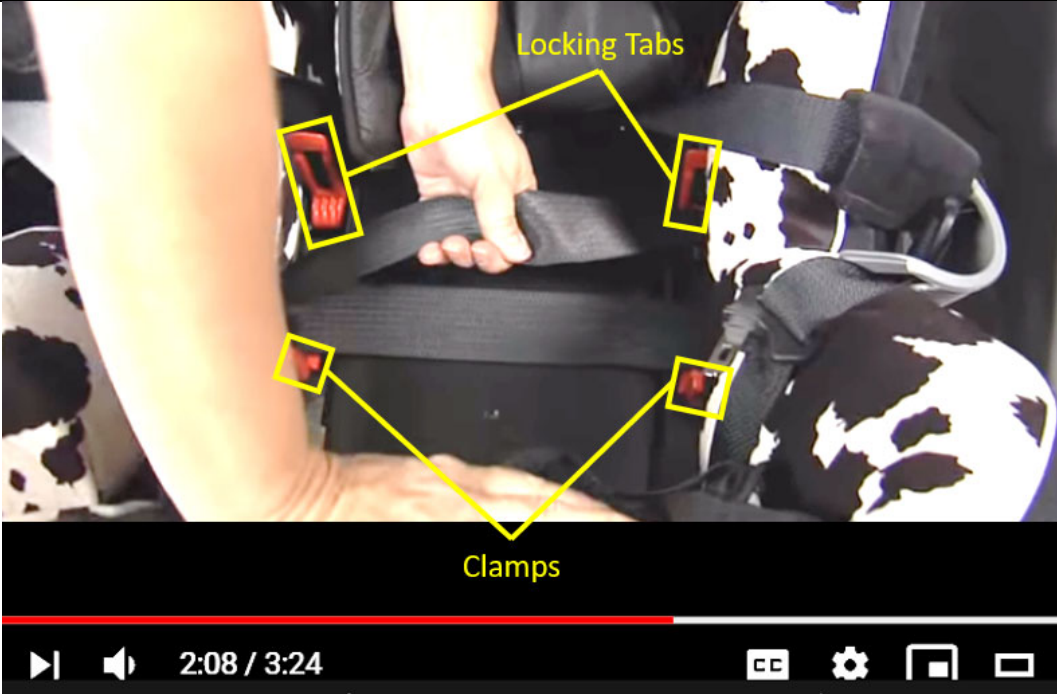
<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 2.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>
<b>Claim</b>	<b>Prior Art</b>
<p>3. The child seat according to claim 1, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the second belt path extending transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, p. 29.</p> </div> <div style="width: 35%;">     </div> </div>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

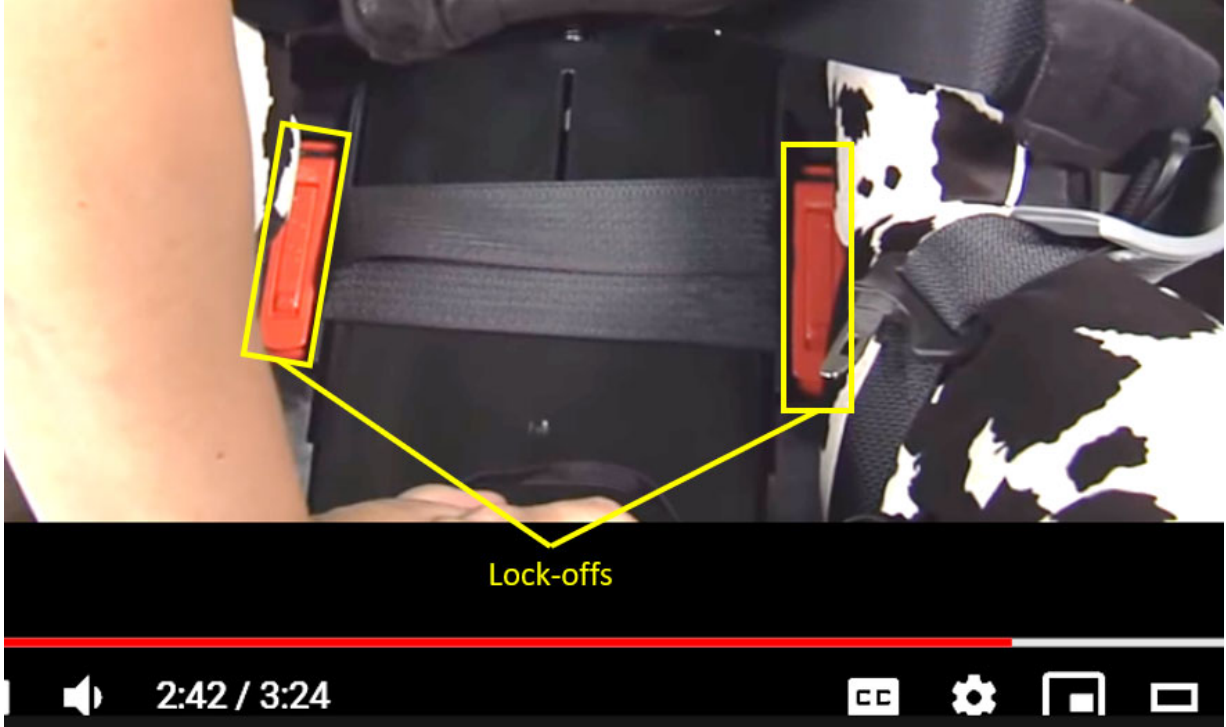
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 3.</p>
4. The child seat according to claim 1, wherein the tensioning mechanism is attached to the backrest portion so	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism is attached to the backrest portion so that the first and second edge surfaces are movable from the second position to the first position in response to receipt of a substantially vertical force. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

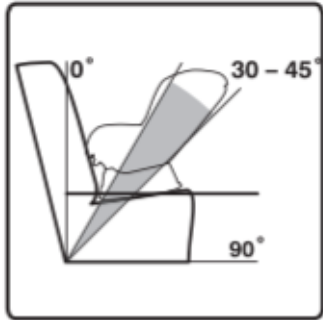
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>that the first and second edge surfaces are movable from the second position to the first position in response to receipt of a substantially vertical force.</p>	<div data-bbox="856 362 1270 1144"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1285 367 1661 597"> </div> <div data-bbox="1285 613 1661 844"> </div> <div data-bbox="1285 860 1661 1091"> </div> <div data-bbox="1285 1107 1661 1338"> </div>

*Boulevard 70 CS User Guide, p. 29.*


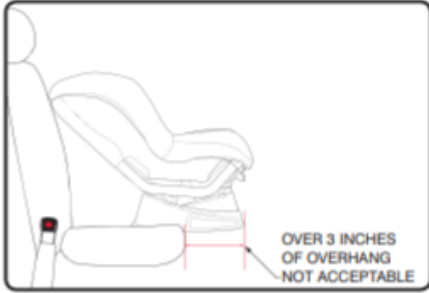

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

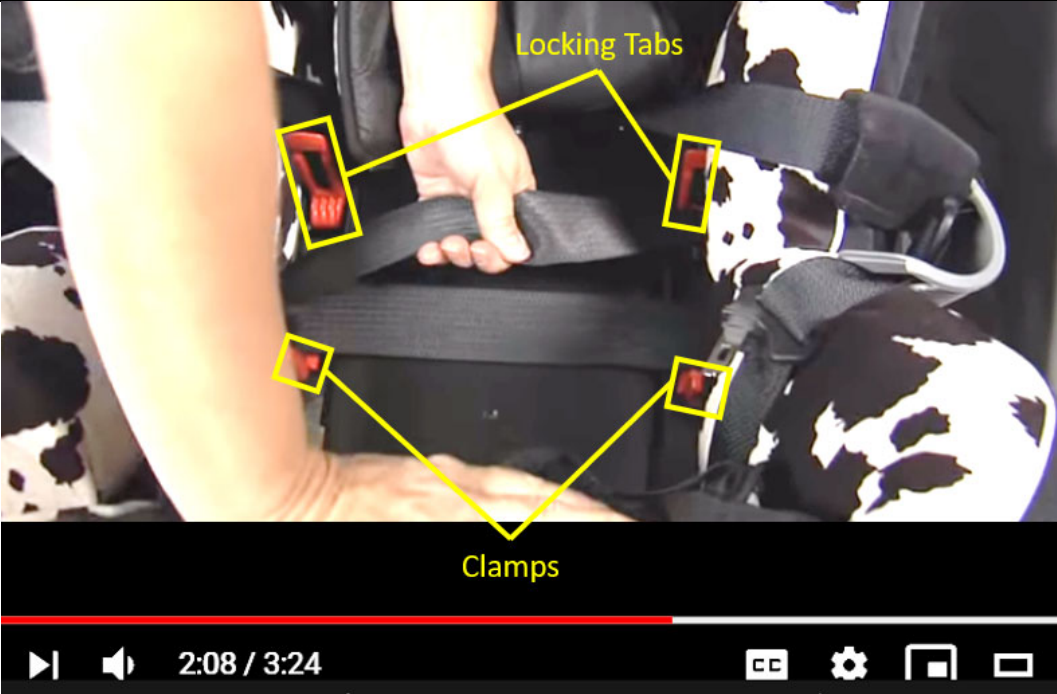
<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	See claim element 1(b)(1) for the motivation to combine.  <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 4.
[5(p)] A child seat configured to be secured to a vehicle seat in a rear-facing orientation in which an occupant of the child seat faces toward a backrest of the vehicle seat and a forward-facing orientation in which an occupant of the child seat faces away from the vehicle backrest, where the vehicle seat has a vehicle belt having a lap portion and a shoulder portion, the child seat comprising:	<p><i>Boulevard 70 CS</i> discloses or renders obvious a child seat configured to be secured to a vehicle seat in a rear-facing orientation in which an occupant of the child seat faces toward a backrest of the vehicle seat and a forward-facing orientation in which an occupant of the child seat faces away from the vehicle backrest, where the vehicle seat has a vehicle belt having a lap portion and a shoulder portion. <i>Boulevard 70 CS User Guide</i>, p. 15; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p>  <p><i>Id.</i>, p. 15.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p><i>Unacceptable overhang</i></p> </div> </div> <div style="text-align: right; margin-top: 10px;">  </div> <p style="text-align: right;"><i>Id.</i>, p. 15.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

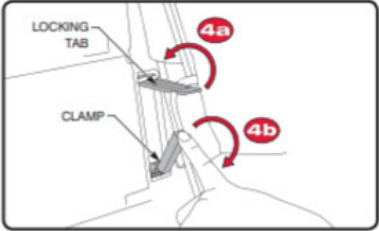
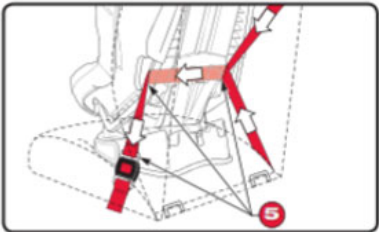

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(a)(1)] a seat base comprising a seat portion, a backrest portion, and	<p>See claim element [1(a)(1)].</p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(a)(2)] first and second lateral edges that protrude	<p>See claim element [1(a)(2)].</p>



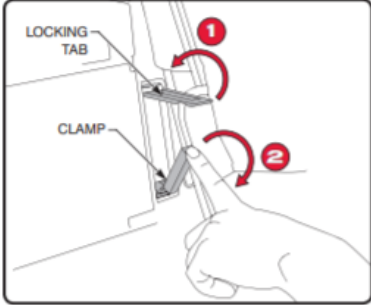
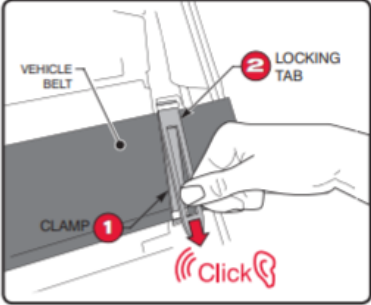
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
forwardly and upwardly from the seat and backrest portions;	<i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(b)(1)] a first belt path generally at a middle of the seat portion in a forward and rearward direction, and	See claim element [1(a)(3)].  <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(b)(2)] a second belt path generally at an intersection of the seat and backrest portions; and	See claim element [1(a)(4)].  <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(c)(1)] a tensioning mechanism attached to the seat base to be movable between a first position and a second position,	See claim element [1(b)(1)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(c)(2)] the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism is rotatable between the first position and the second position pivotally about the axis, and	See claim element [1(b)(2)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.

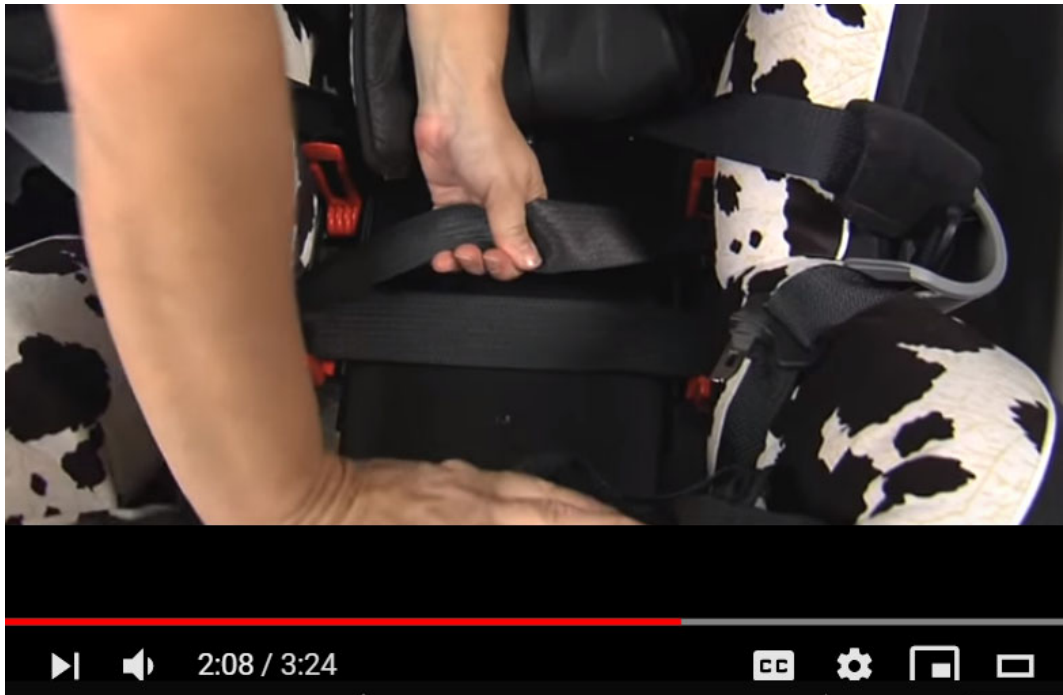
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>[5(c)(3)] wherein the tensioning mechanism has a first rigid edge surface and a second rigid edge surface,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism has a first rigid edge surface and a second rigid edge surface. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div> <p style="text-align: right;"><i>Id.</i>, p. 29.</p>

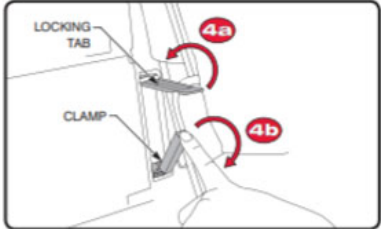
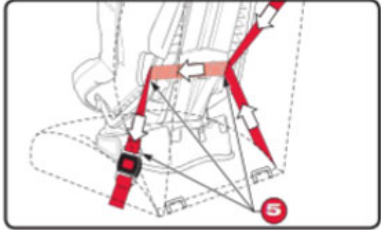

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>

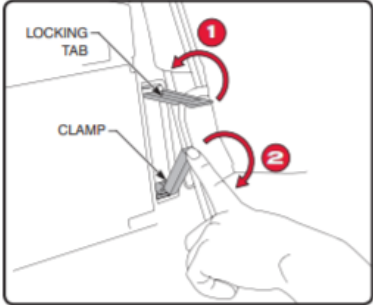
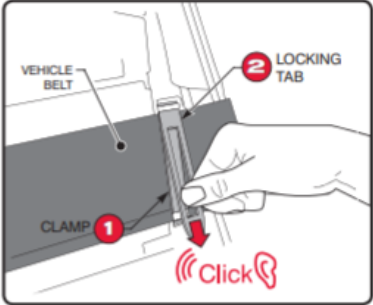
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(c)(4)] the first and second ridge edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first and second ridge edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

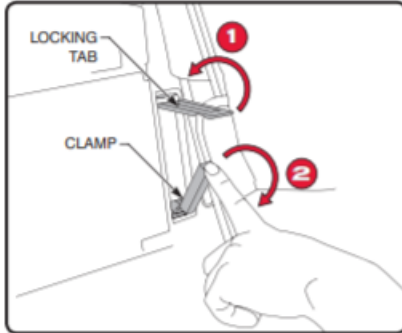

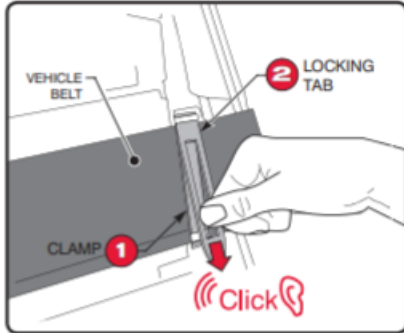
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><i>Id.</i>, p. 29.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 5.</p>
[5(d)(1)] wherein in the first position, the first and second rigid edge surfaces are substantially adjacent to the seat base, and	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the first position, the first and second rigid edge surfaces are substantially adjacent to the seat base. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

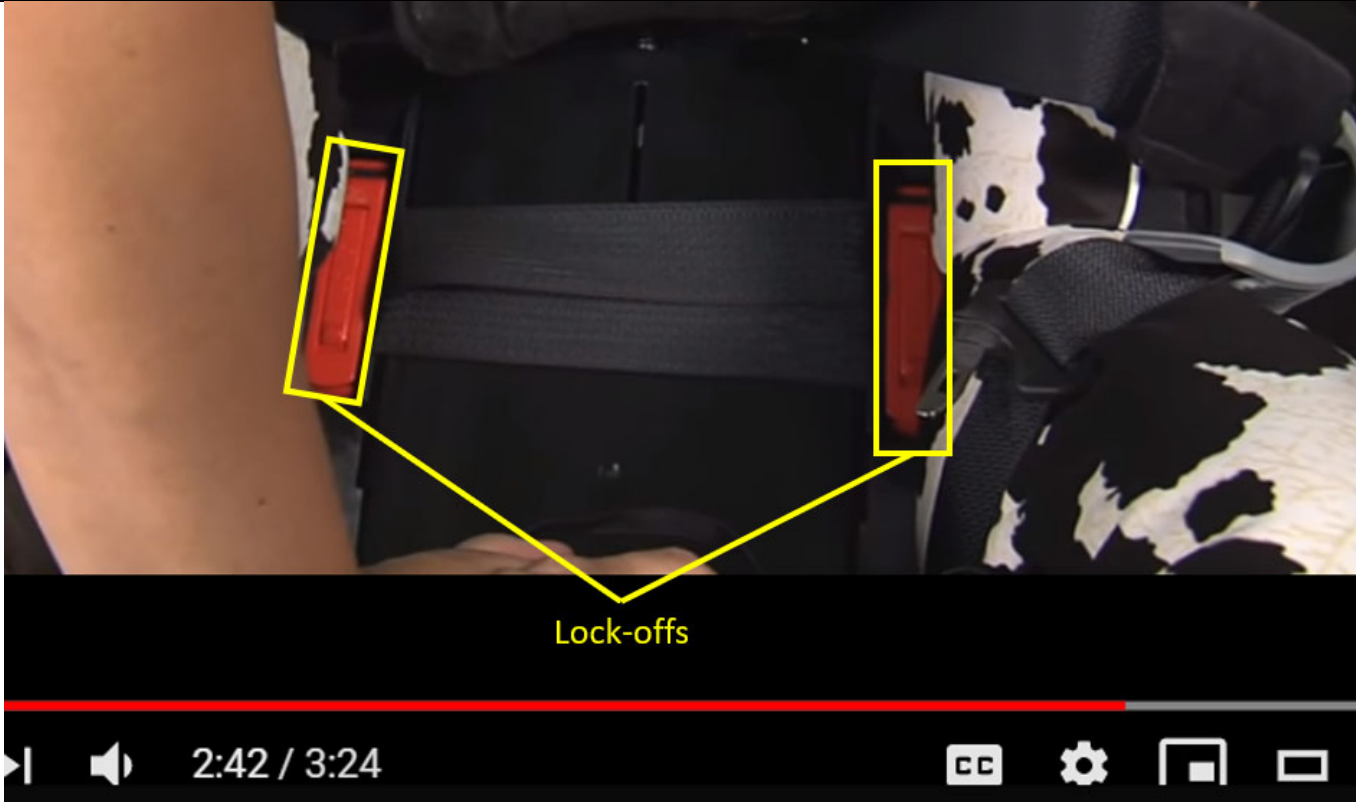


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

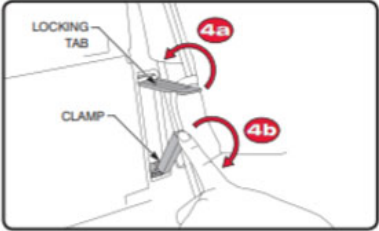
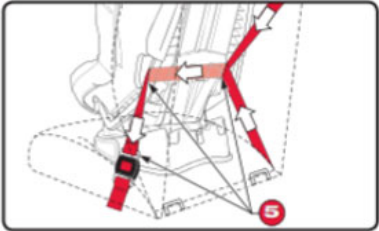

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol>  <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><i>Id.</i>, p. 14.</p>




**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(d)(2)] wherein in the second position, the first	<i>Boulevard 70 CS discloses or renders obvious that in the second position, the first and second rigid edge surfaces are at least partly displaced from the seat base so that the lap section of the vehicle belt and the</i>

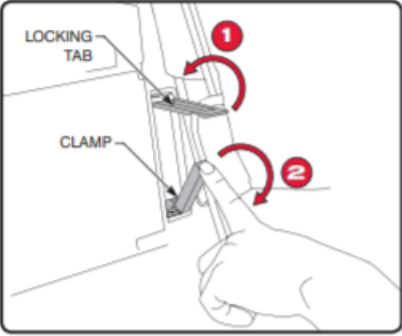
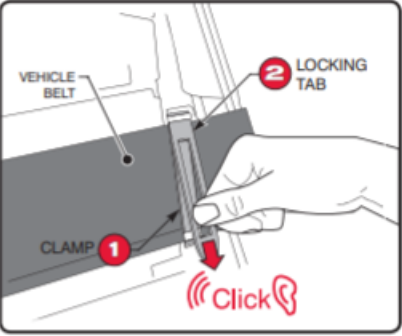

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>and second rigid edge surfaces are at least partly displaced from the seat base so that the lap section of the vehicle belt and the shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat,</p>	<p>shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div> <p style="text-align: right;"><i>Id.</i>, p. 29.</p>

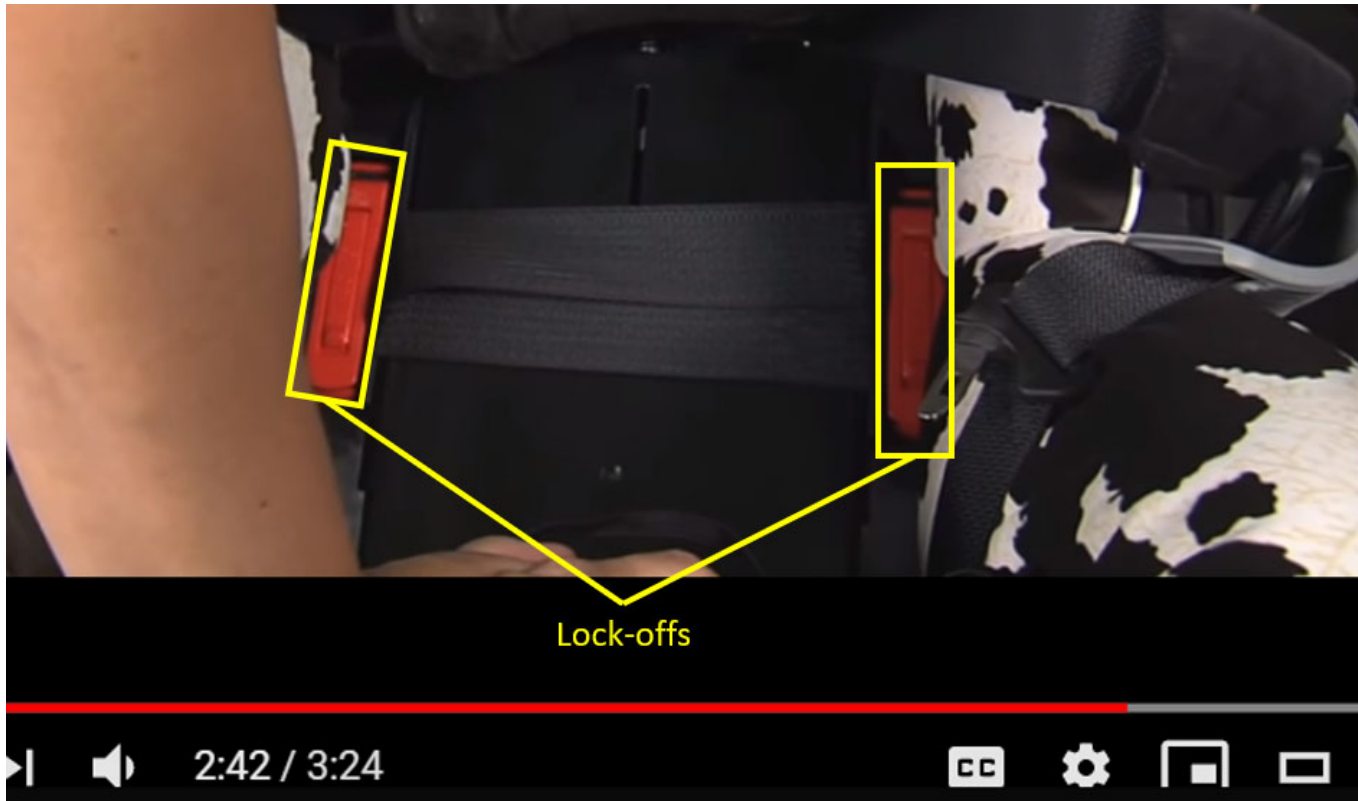
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(e)] wherein movement of the first and second rigid edge surfaces from the second position to the	<i>Boulevard 70 CS discloses or renders obvious movement of the first and second rigid edge surfaces from the second position to the first position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat</i>

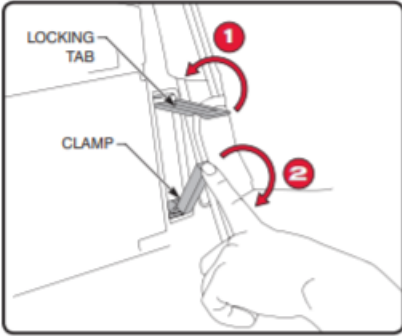
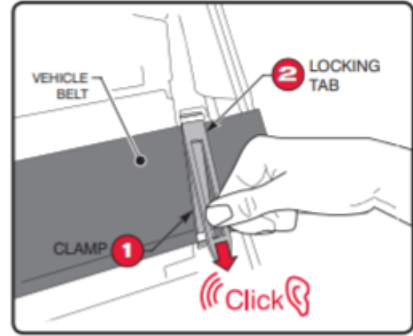
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>first position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat in the forward-facing orientation,</p>	<p>in the forward-facing orientation. <i>oulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div data-bbox="793 646 919 678"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1255 646 1381 678"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> <div data-bbox="772 1227 884 1279">  </div> <p><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

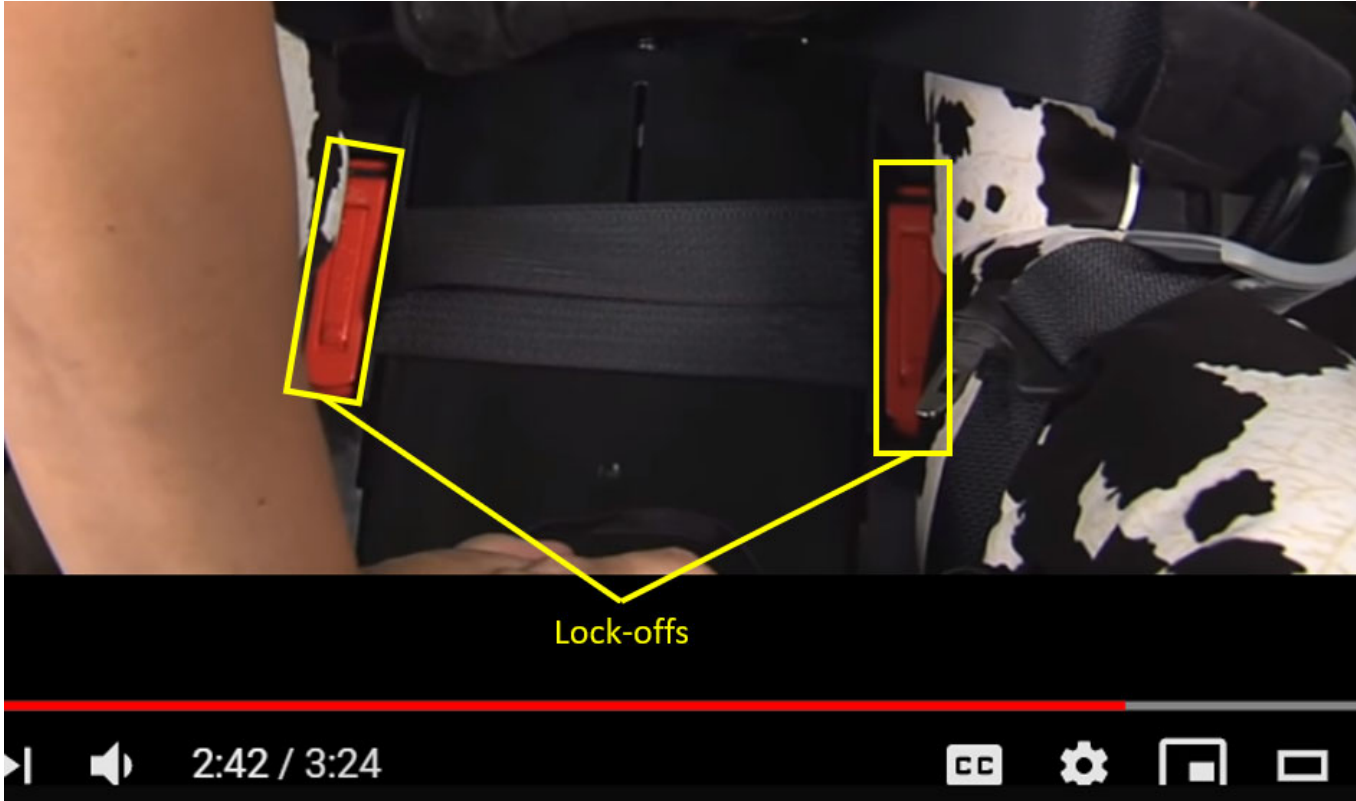
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>[5(f)] wherein, in the forward-facing orientation, the first and second rigid edge surfaces of a first portion of the tensioning mechanism displace the belt to apply tension to the belt in the second belt path, and</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the forward-facing orientation, the first and second rigid edge surfaces of a first portion of the tensioning mechanism displace the belt to apply tension to the belt in the second belt path. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p><b>14</b></p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

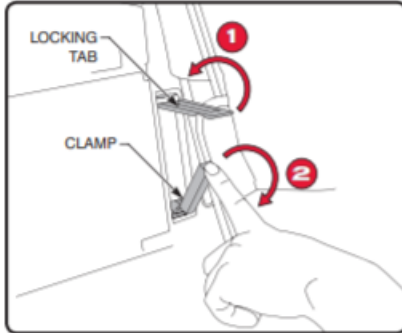
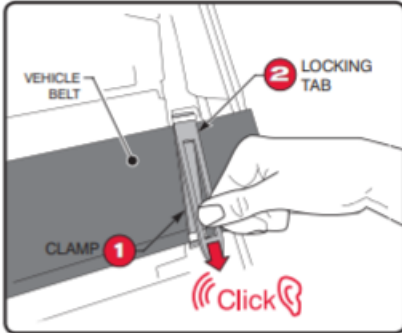
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><i>Id.</i>, p. 14.</p>  <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

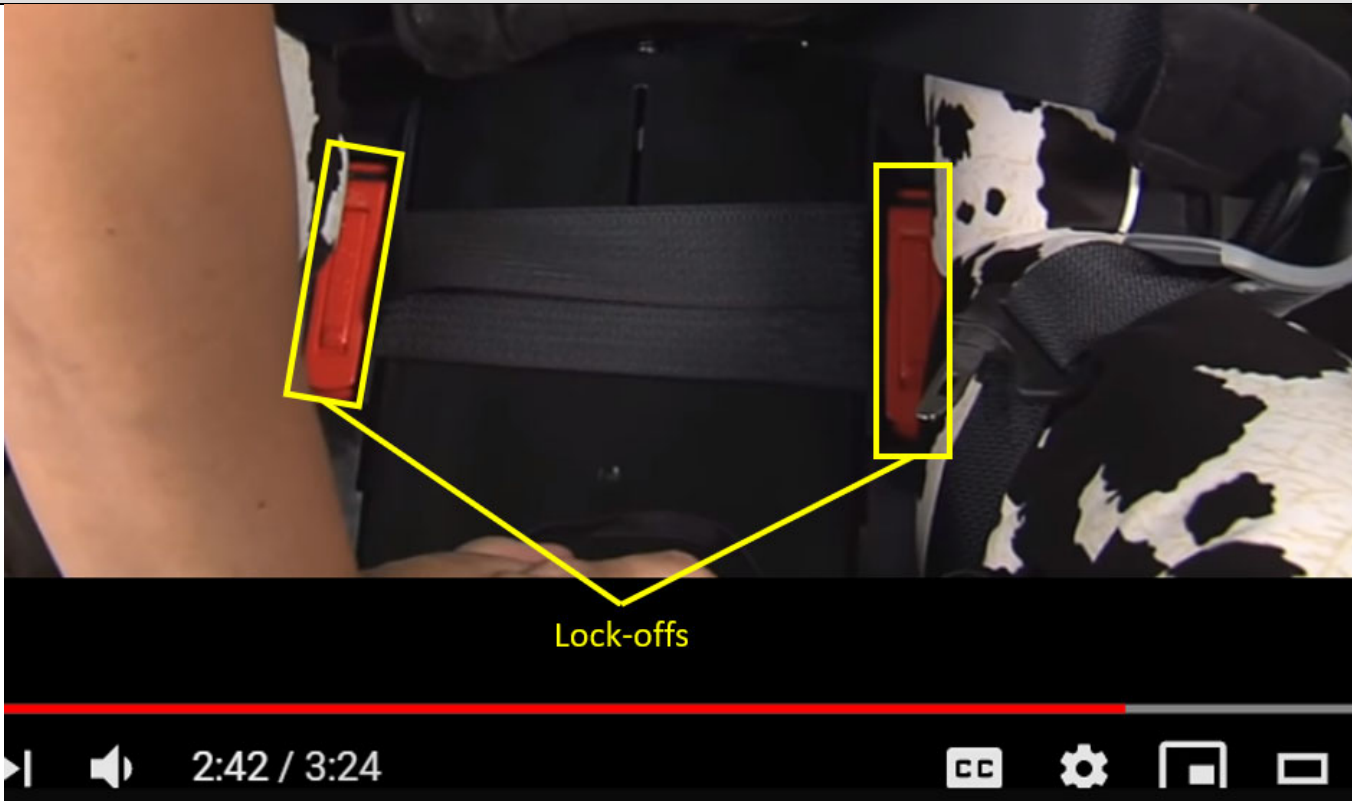
<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p><i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat's</i> tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 5.</p>
[5(g)] wherein, in the rear-facing orientation, the first and second rigid edge surfaces of a second portion of the tensioning mechanism displace the belt to apply tension to the belt.	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the rear-facing orientation, the first and second rigid edge surfaces of a second portion of the tensioning mechanism displace the belt to apply tension to the belt. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>



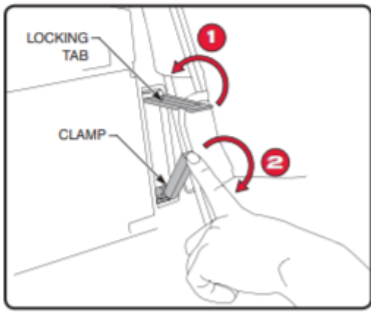
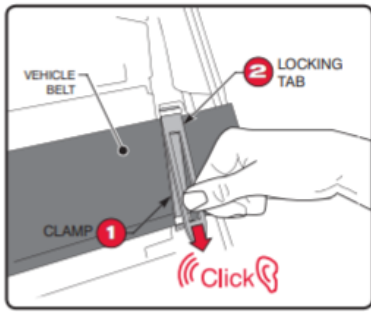

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>

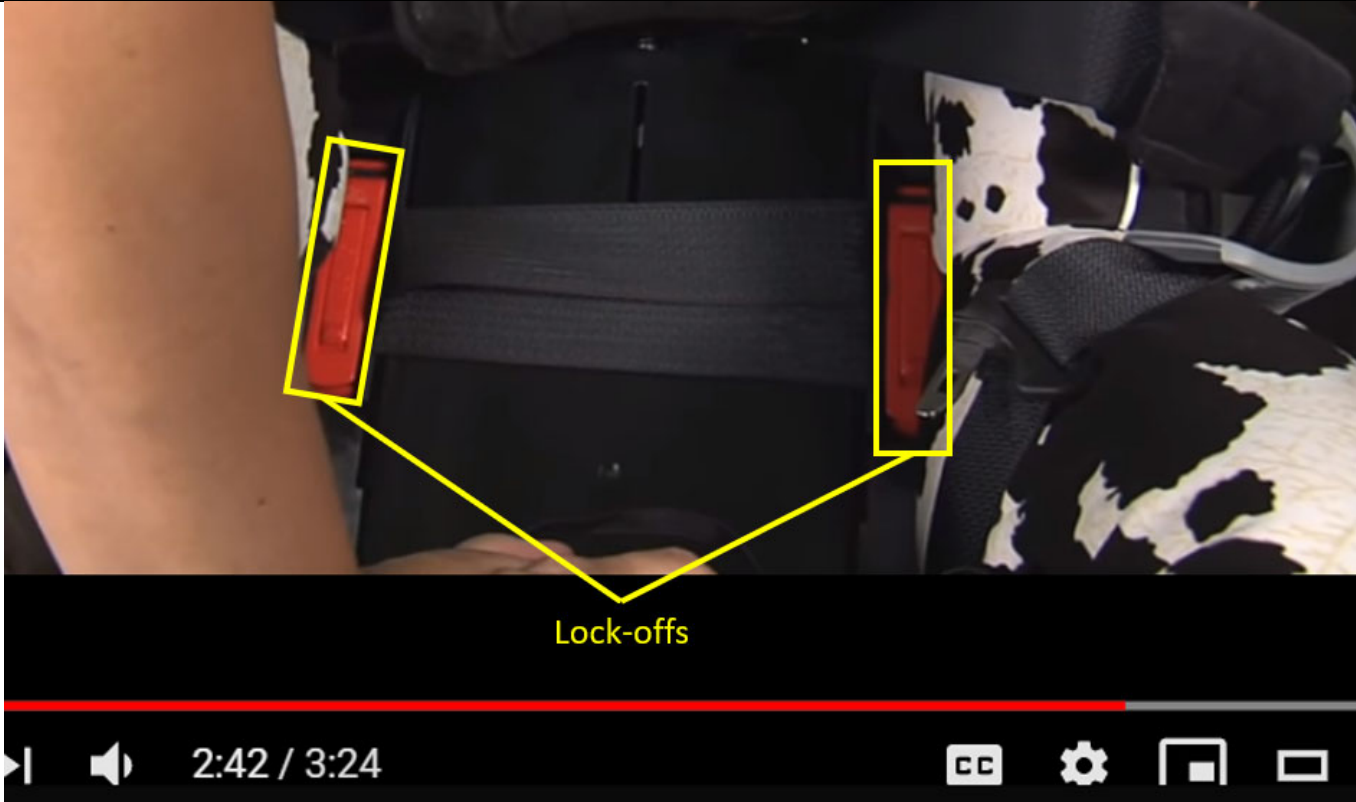
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
<p>6. The child seat according to the claim 5, wherein the first belt path is configured to allow a user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation, wherein the second belt path is configured to allow the user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path being configured to allow a user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation, and the second belt path being configured to allow the user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div data-bbox="840 682 1638 1412"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <div style="text-align: center; margin-top: 20px;">  </div> </div> <p><i>Id.</i>, p. 14.</p>

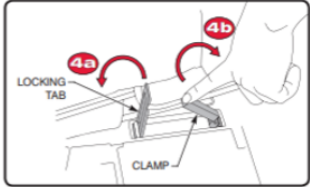


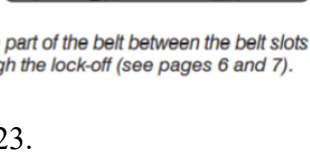
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Id.</i>, p. 23.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

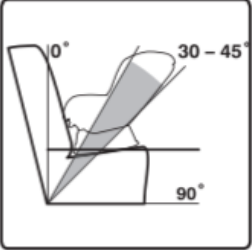

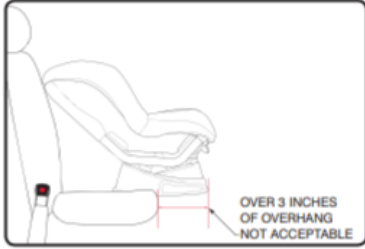

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 6.</p>
7. The child seat according to claim 6,	See claim 2.



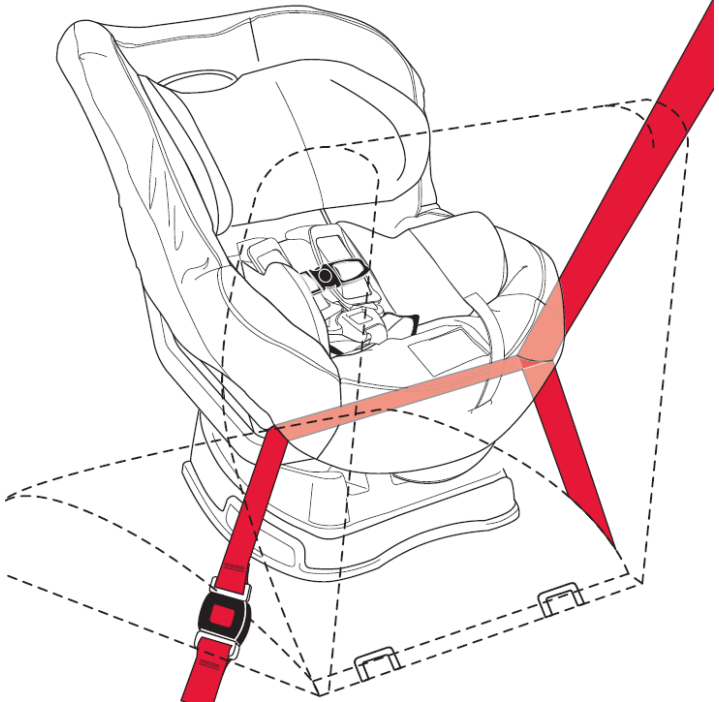
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.	The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 7.
8. The child seat according to claim 6, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.	See claim 3.  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 8.
[9(p)] A child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation with a vehicle belt, the child seat comprising:	<i>Boulevard 70 CS</i> discloses or renders obvious that in each of the forward or rear-facing orientations, respective different portions of the first and second lateral edge surfaces of the tensioning mechanism displace the belt to apply tension to the belt. <i>Boulevard 70 CS User Guide</i> , p. 15.

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p>  <p><i>Id.</i>, p. 15.</p> <p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>UP TO 3 INCHES OF OVERHANG ACCEPTABLE</p> <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p>OVER 3 INCHES OF OVERHANG NOT ACCEPTABLE</p> <p><i>Unacceptable overhang</i></p> </div> </div>  <p><i>Id.</i>, p. 15.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>

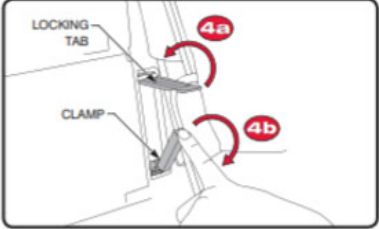
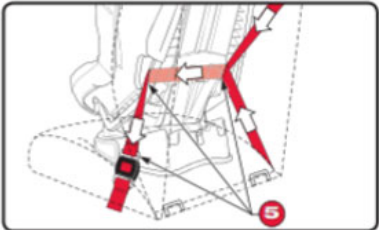

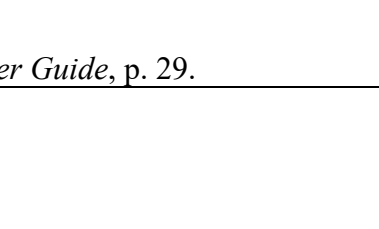

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
[9(a)(1)] a seat base comprising a seat portion, a backrest portion, and	See claim element [1(a)(1)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 9.
[9(a)(2)] opposing side portions that protrude forwardly from the backrest portion and upwardly from the seat portion;	<p><i>Boulevard 70 CS</i> discloses or renders obvious opposing side portions that protrude forwardly from the backrest portion and upwardly from the seat portion. <i>Boulevard 70 CS User Guide</i>, p. 22.</p>  <p><i>Id.</i>, p. 22.</p>

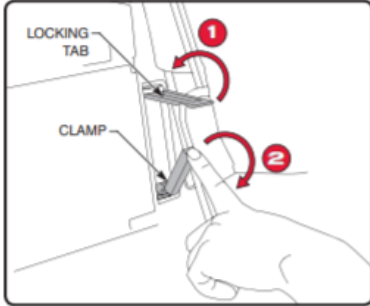
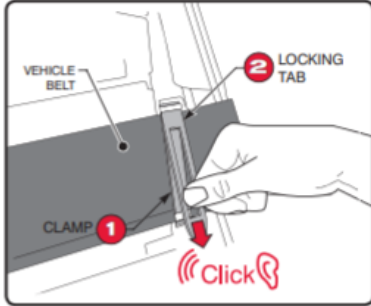

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 9.
[9(b)(1)] a first belt path generally at a middle of the seat portion in a forward and rearward direction, and	See claim element [1(a)(3)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 9.
[9(b)(2)] a second belt path generally at an intersection of the seat and backrest portions; and	See claim element [1(a)(4)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 9.
[9(c)(1)] a tensioning mechanism attached to the seat base to be movable between a first position and a second position and comprising an engaging surface,	<i>Boulevard 70 CS</i> discloses or renders obvious a tensioning mechanism attached to the seat base to be movable between a first position and a second position and comprising an engaging surface. <i>Boulevard 70 CS User Guide</i> , p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> .

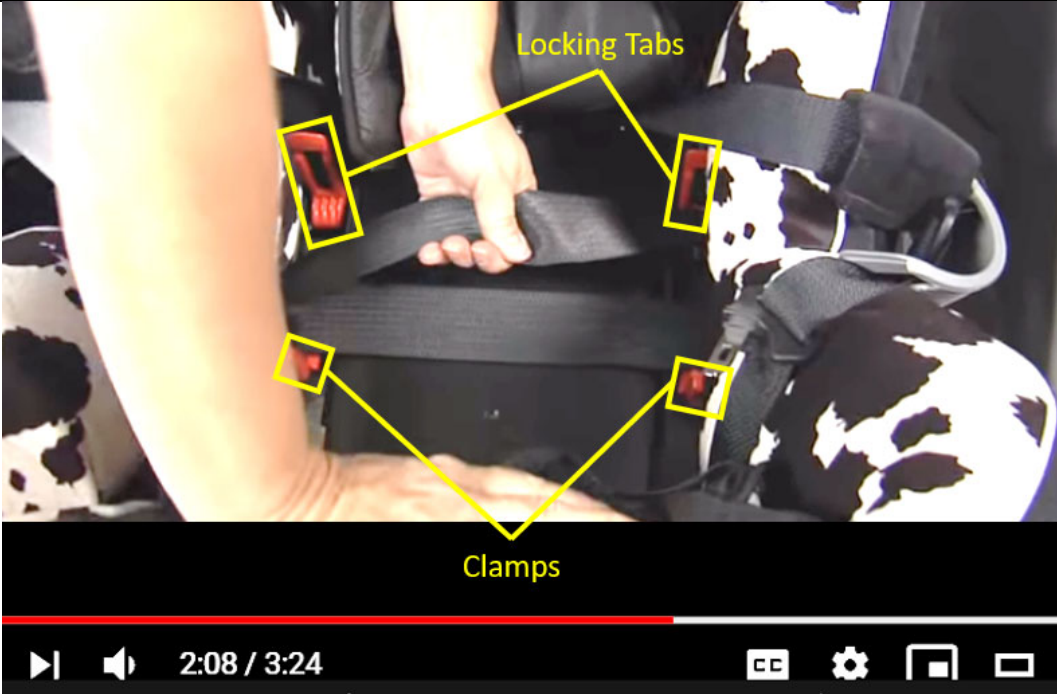
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p>      <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>

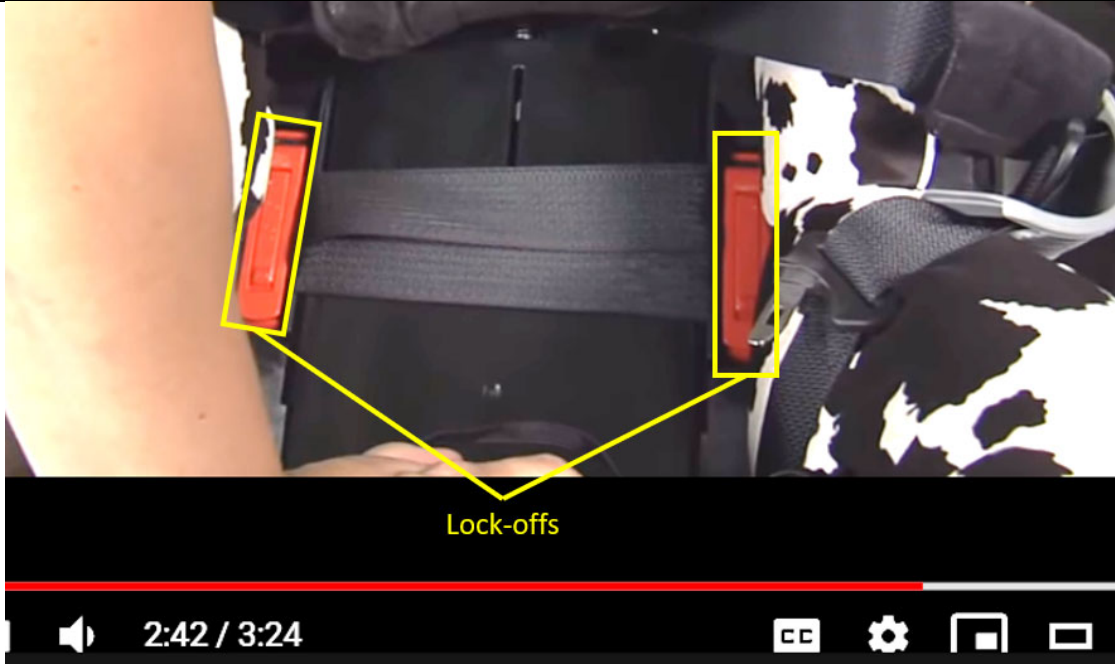
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p></p> <p><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

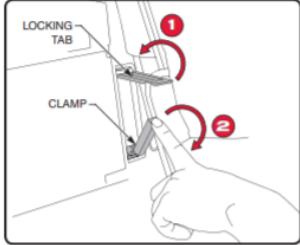
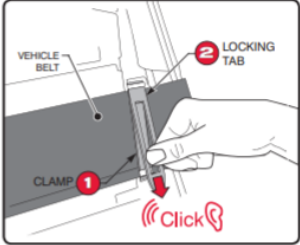
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

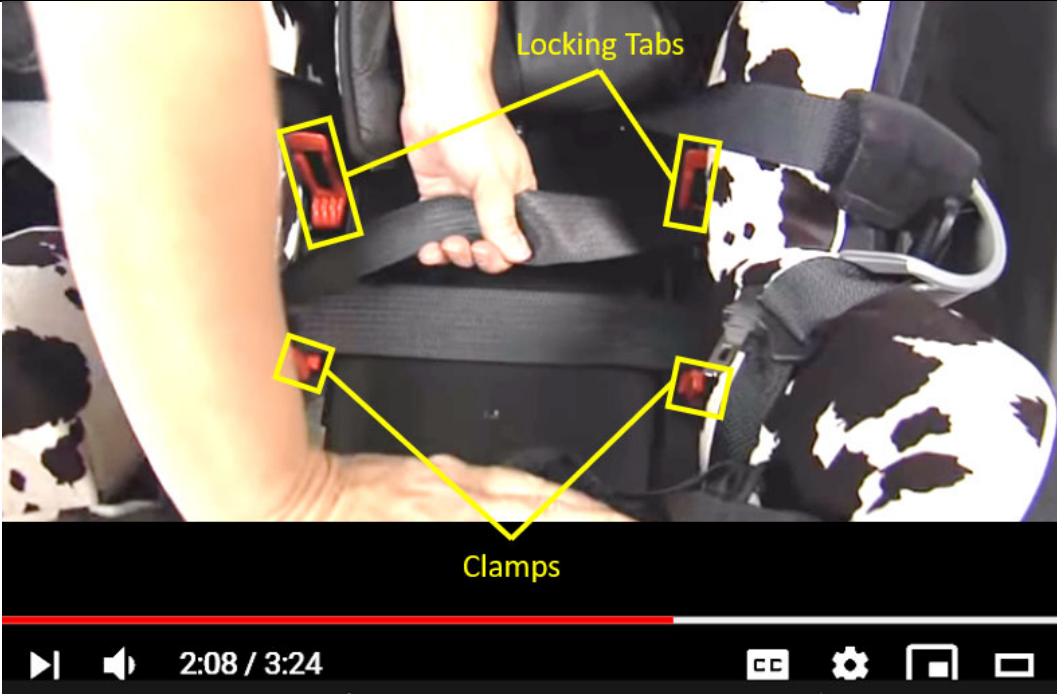
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(c)(2)] the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism is configured to rotate	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism is configured to rotate downwardly to the first position from the second position about an axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>



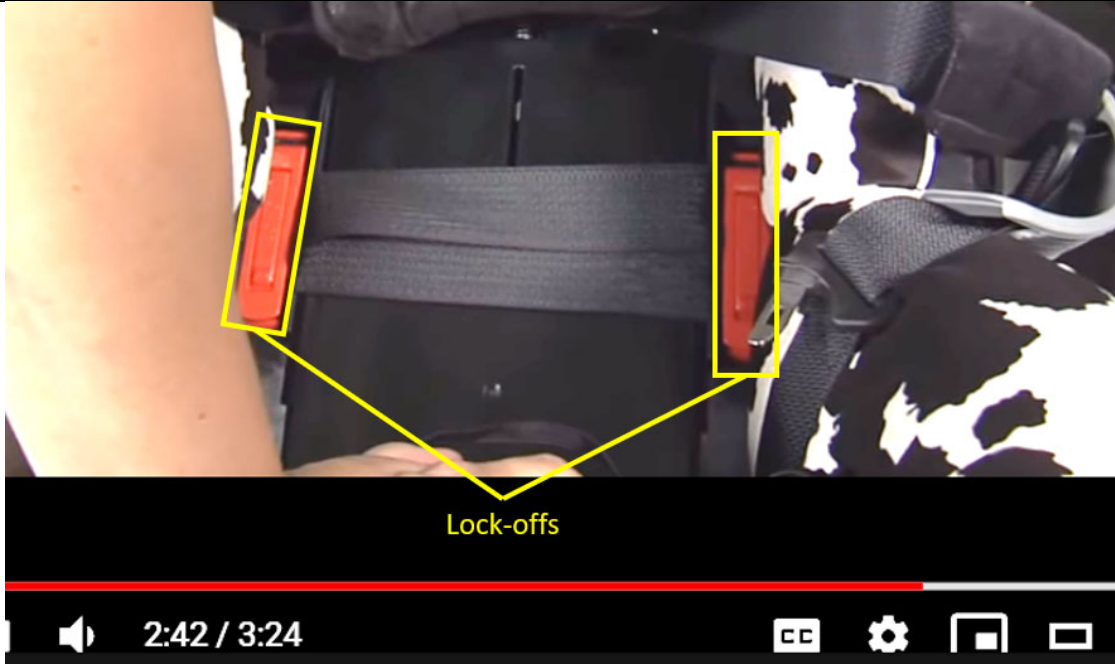
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
downwardly to the first position from the second position about an axis, and	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>

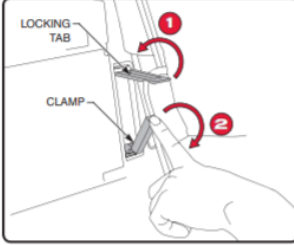
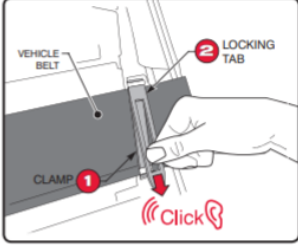
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>The video frame shows a person's hands installing a car seat. A black seat belt is being threaded through the car seat's harness. Four yellow boxes highlight specific components: two labeled 'Locking Tabs' (top left and top right) and two labeled 'Clamps' (bottom left and bottom right). A red progress bar is visible at the bottom of the video frame, indicating the video is at 2:08 / 3:24. Below the video frame, the text reads: 'Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated)'.</p>

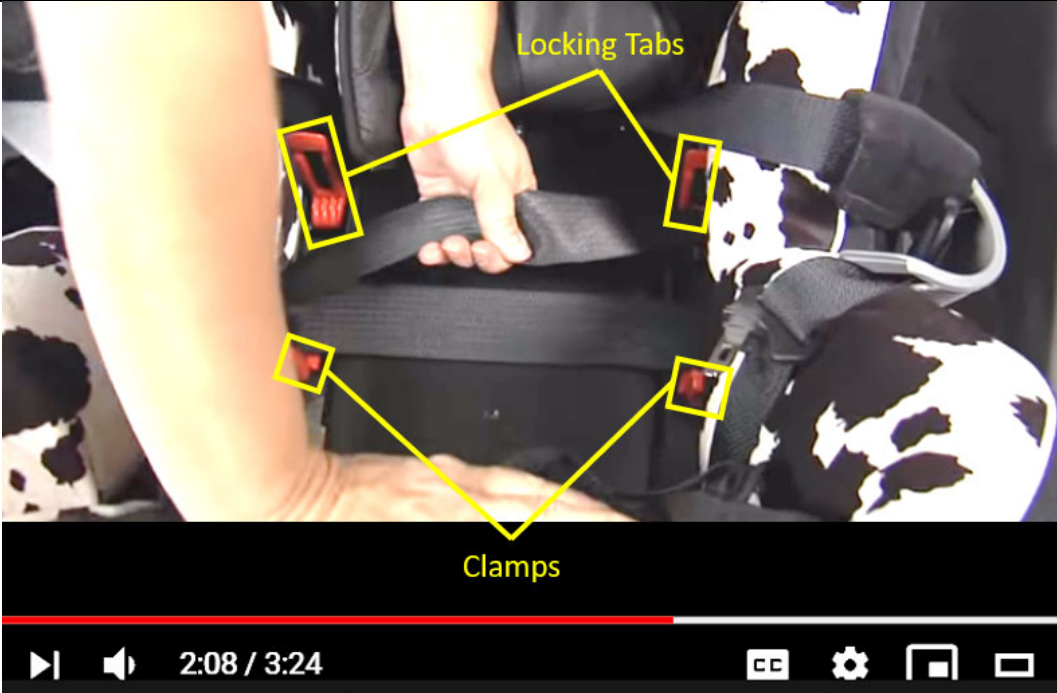
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(c)(3)] wherein the tensioning mechanism has a first lateral edge surface and a second lateral edge surface,	<p>See claim element [(1)(b)(3)].</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>

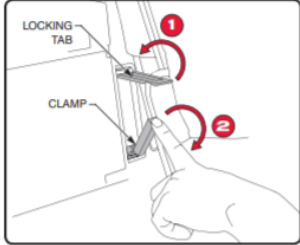
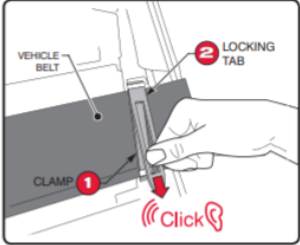
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>[9(c)(4)] the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div data-bbox="919 532 1564 1047"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div data-bbox="919 649 1228 982"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1260 649 1564 1047"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <div data-bbox="907 1079 991 1120"> <p>14</p> </div> <p><i>Boulevard 70 CS User Guide</i>, p. 14.</p>

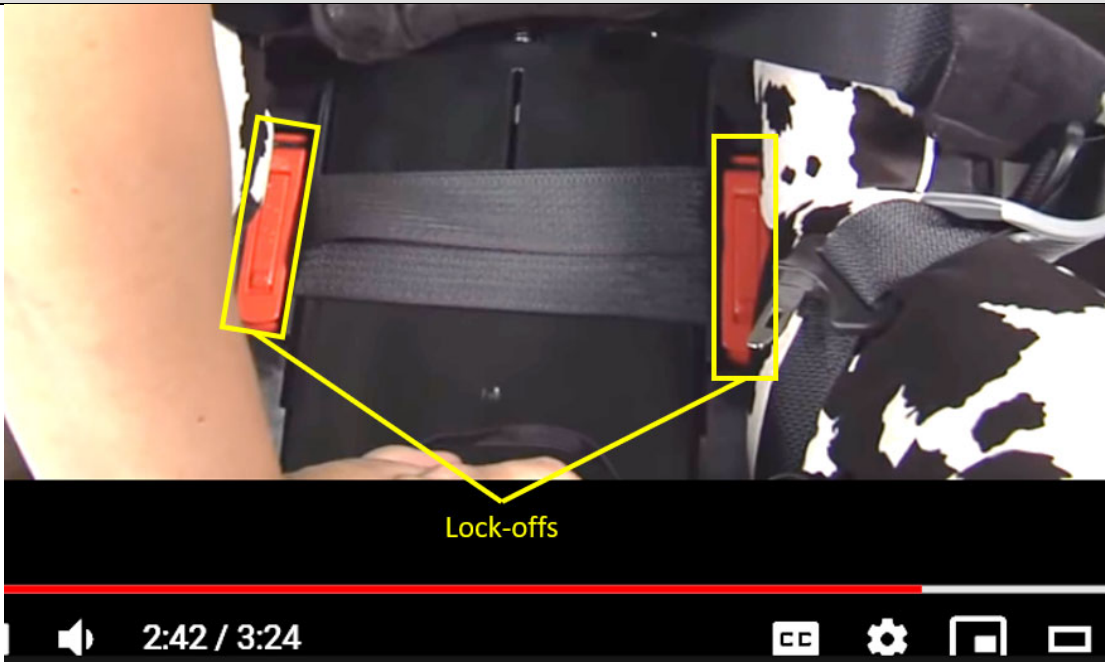
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(d)] wherein in the first position, the first and second lateral edge surfaces are substantially	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the first position, the first and second lateral edge surfaces are substantially adjacent to the seat base. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

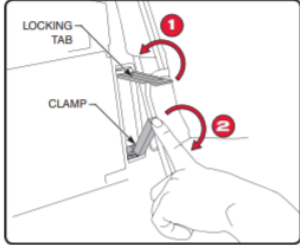
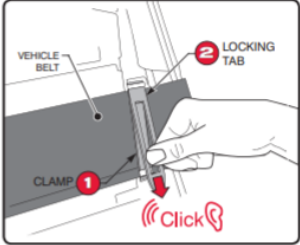
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
adjacent to the seat base, and	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

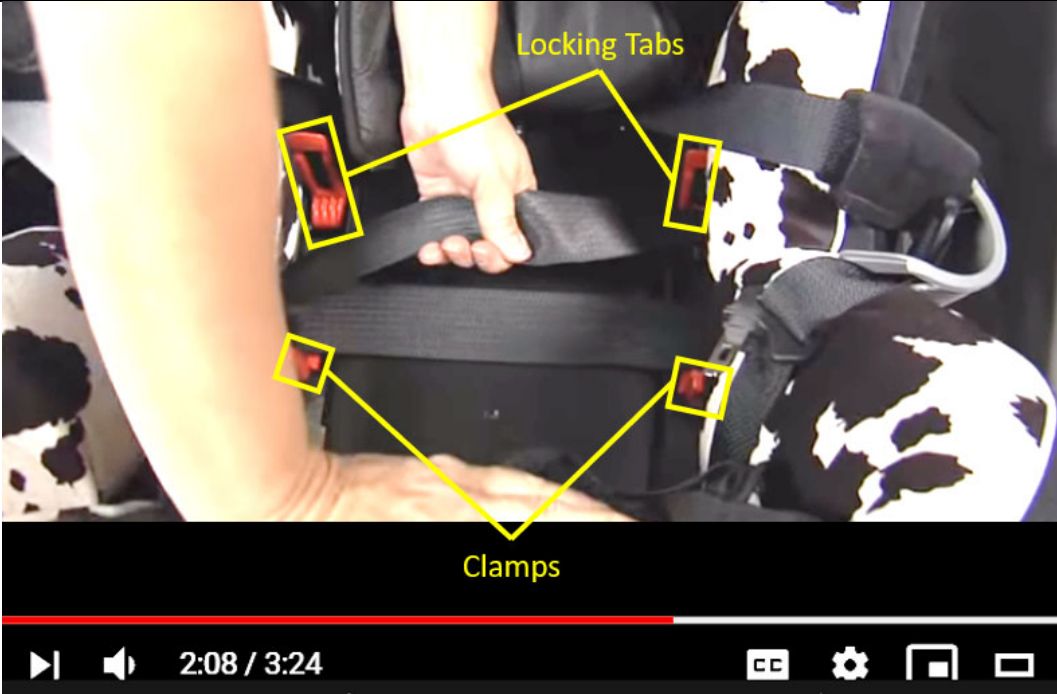
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax</i>  <i>Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>  (annotated).</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(e)] wherein in the second position, the first and second lateral edge surfaces are at least partly displaced from the seat	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the second position, the first and second lateral edge surfaces are at least partly displaced from the seat base in order to receive the vehicle belt.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

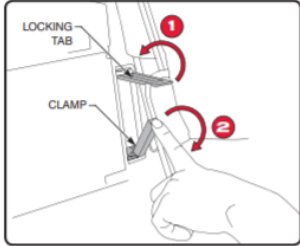
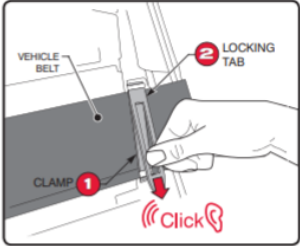

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
base in order to receive the vehicle belt,	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>



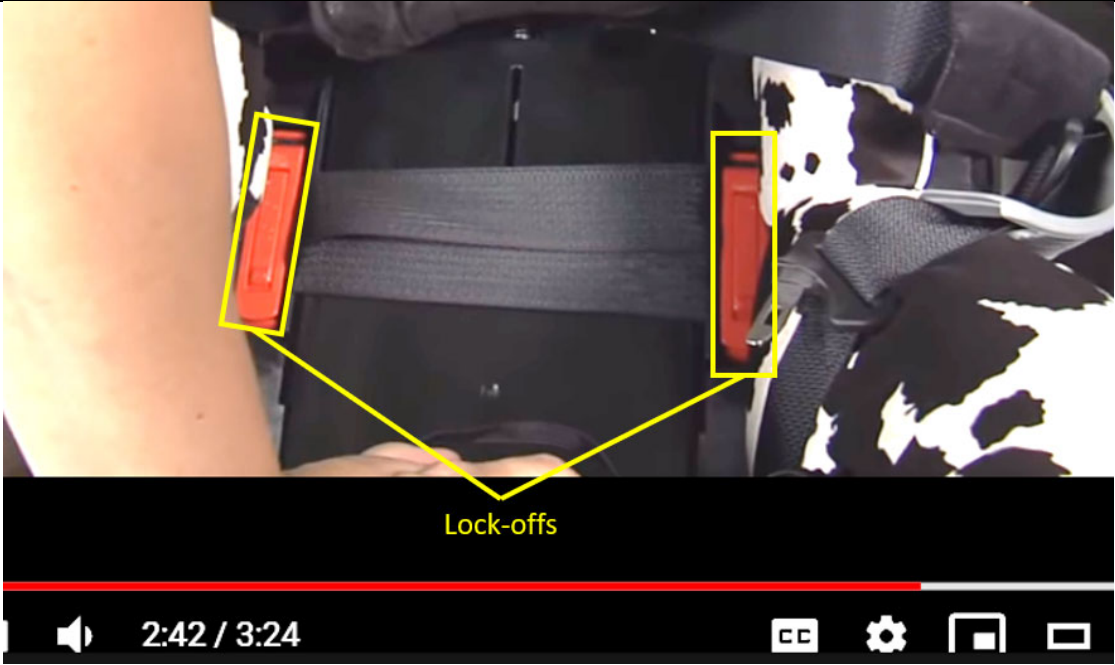
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(f)] wherein movement of the first and second lateral edge surfaces from the second position to the first position causes the	<p><i>Boulevard 70 CS</i> discloses or renders obvious movement of the first and second lateral edge surfaces from the second position to the first position causes the engaging surface, which is disposed between the first and second lateral edge surfaces, to press a first portion of the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the vehicle belt to secure the child</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>engaging surface, which is disposed between the first and second lateral edge surfaces, to press a first portion of the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the vehicle belt to secure the child seat to the vehicle seat in a tensioned configuration, and</p>	<p>seat to the vehicle seat in a tensioned configuration. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> </div> </div> <p style="text-align: center;"></p> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, p. 14.</p>

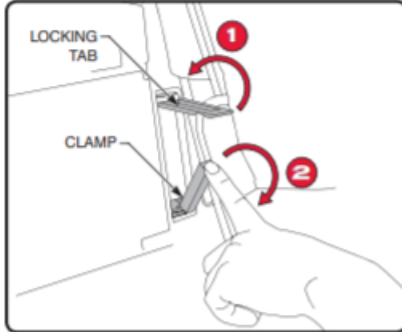
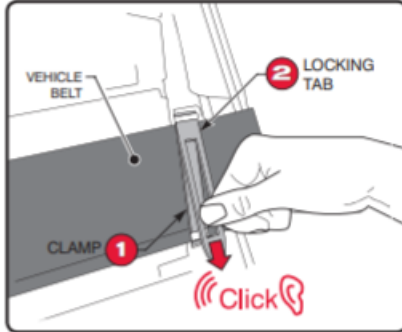
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p data-bbox="674 1008 1913 1078"><i>Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated). Britax</p> <p data-bbox="575 1117 1898 1263">Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p data-bbox="575 1300 1297 1333">See claim element 1(b)(1) for the motivation to combine.</p> <p data-bbox="575 1370 1877 1442"><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
[9(g)] wherein, in each of the forward or rear-facing orientations, respective different portions of the first and second lateral edge surfaces of the tensioning mechanism displace the belt to apply tension to the belt.	<i>Boulevard 70 CS</i> discloses or renders obvious that in each of the forward or rear-facing orientations, respective different portions of the first and second lateral edge surfaces of the tensioning mechanism displace the belt to apply tension to the belt. <i>Boulevard 70 CS User Guide</i> , p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> ; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> .

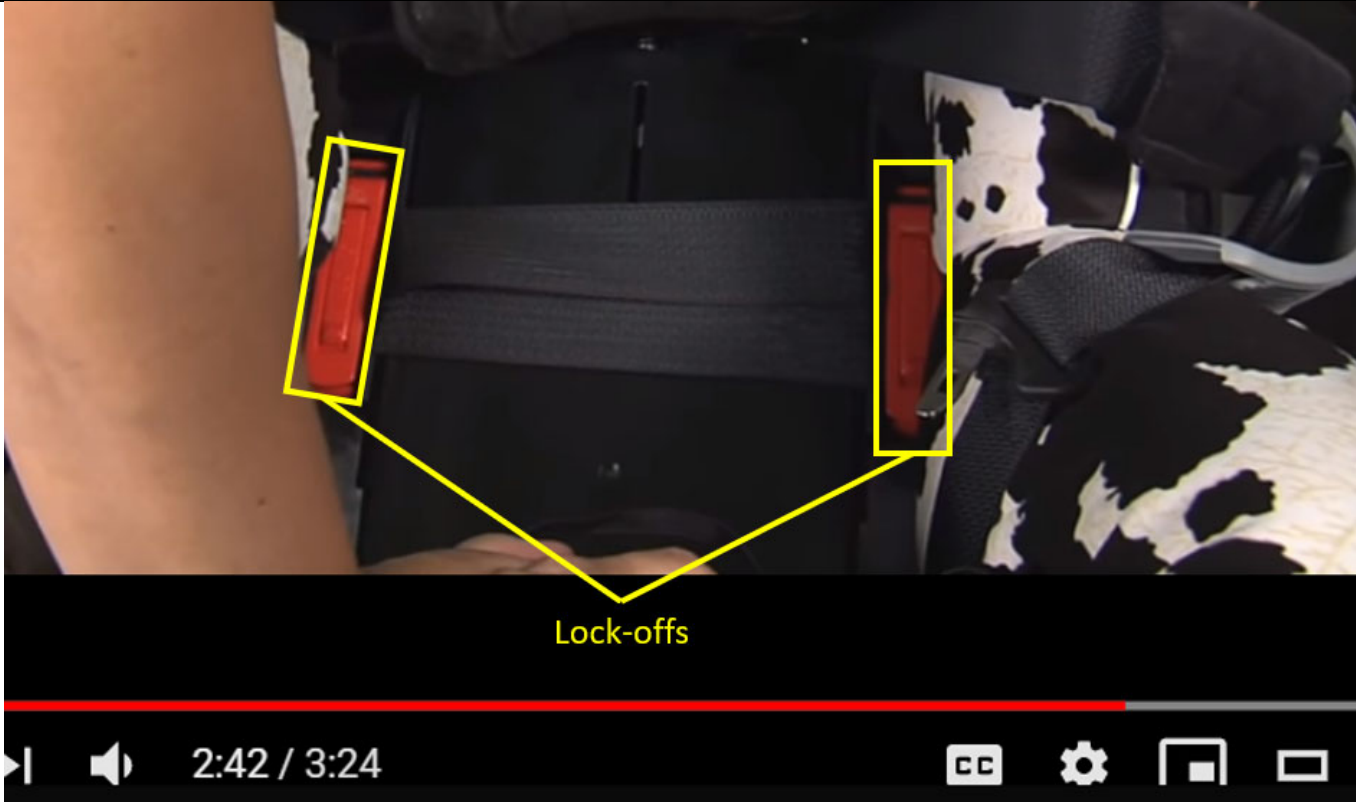
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>

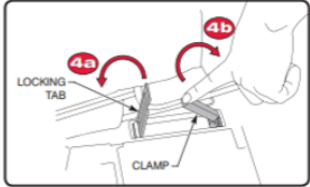


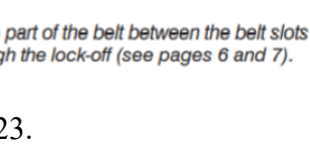
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Id.</i>, p. 23.</p>



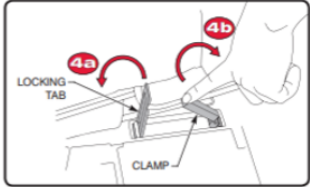


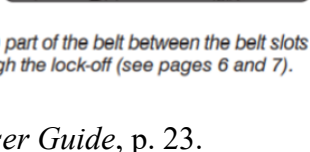
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[10(a)] The child seat according to claim 9, wherein the first belt path is configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path being configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>child seat to the vehicle seat when the child seat is in the rear-facing orientation,</p>	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>

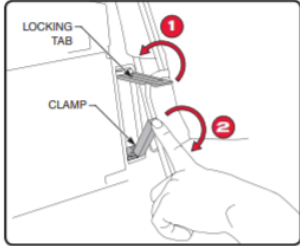
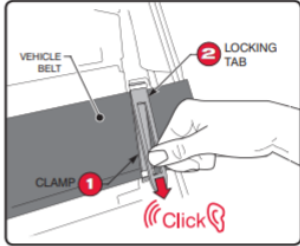

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

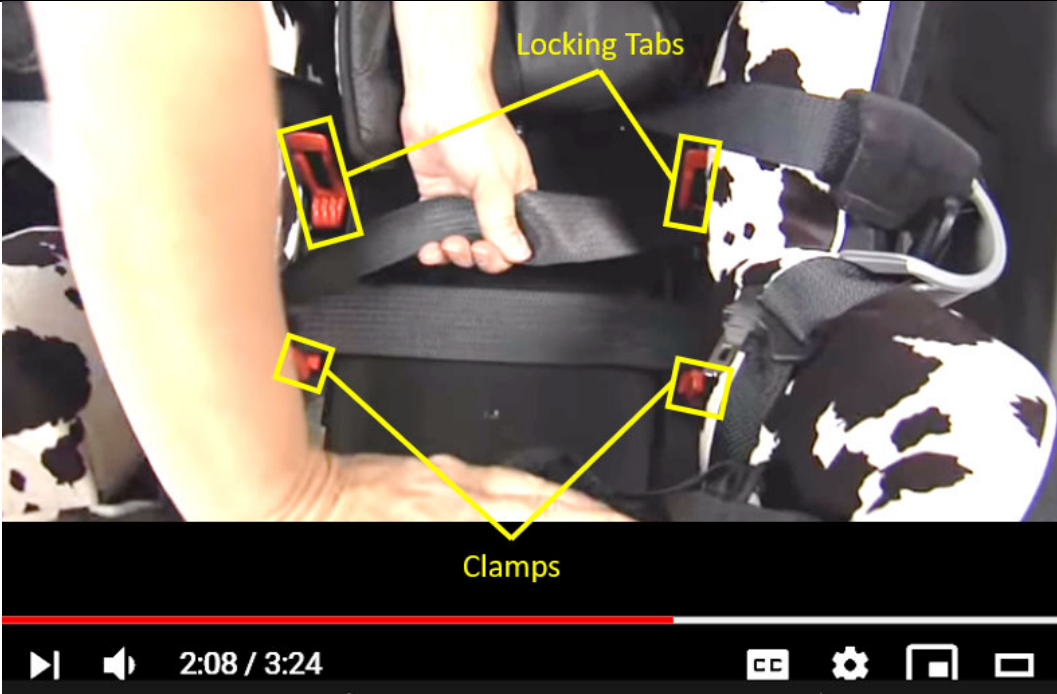
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 10.</p>
[10(b)] wherein the second belt path is configured to allow a user	<p><i>Boulevard 70 CS</i> discloses or renders obvious the second belt path being configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation. <i>Boulevard 70 CS User</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

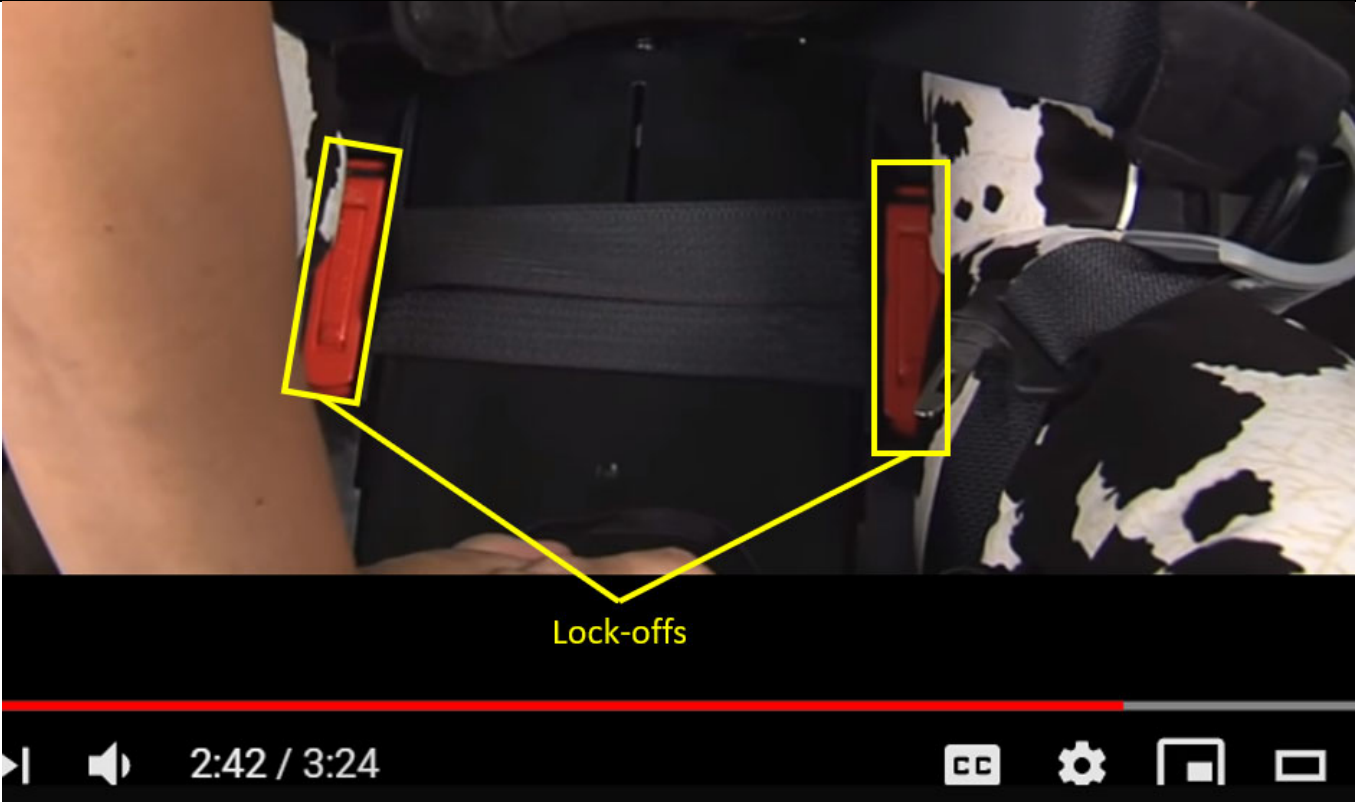
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.</p>	<p><i>Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;"></p> <p style="text-align: center;"><i>Boulevard 70 CS User Guide</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>The video frame shows a person's hands installing a car seat. A black seat belt is being threaded through the car seat's harness. Four yellow boxes highlight specific components: two labeled 'Locking Tabs' (top left and top right) and two labeled 'Clamps' (bottom left and bottom right). A red progress bar is visible at the bottom of the video frame, with a timestamp of 2:08 / 3:24. Below the video frame, the text reads: 'Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated)'.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p data-bbox="575 1133 1923 1209"><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p data-bbox="575 1242 1923 1388">Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 10.</p>
11. The child seat according to claim 10, wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.	<p>See claim 2.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 11.</p>
12. The child seat according to claim 10, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.	<p>See claim 3.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 12.</p>
[13(p)] A child seat configured to be secured	See claim element [1(p)].

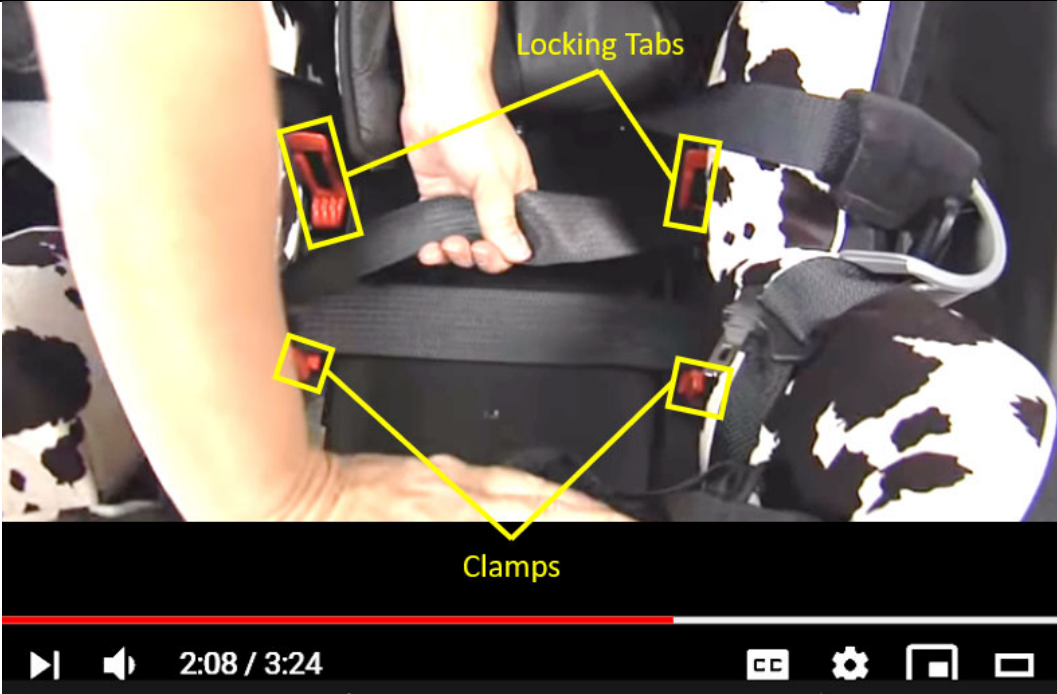
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
to a vehicle seat in both a rear-facing and a forward-facing orientation by a belt of the vehicle seat, the child seat comprising:	The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(1)] a seat base comprising a seat portion, a backrest portion,	See claim element [1(a)(1)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(2)] a first belt path generally at a middle of the seat portion in a forward and rearward direction, and	See claim element [1(a)(3)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(3)] a second belt path generally at an intersection of the seat and backrest portions,	See claim element [1(a)(4)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(4)] first and second lateral edges that protrude forwardly and upwardly from opposing sides of the backrest portion proximate to the second belt path, third and fourth lateral edges that protrude	<i>Boulevard 70 CS</i> discloses or renders obvious the first and second lateral edges that protrude forwardly and upwardly from opposing sides of the backrest portion proximate to the second belt path, third and fourth lateral edges that protrude forwardly and upwardly from opposing sides of the seat portion proximate to the first belt path. <i>Boulevard 70 CS User Guide</i> , p. 23, 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> ; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> .

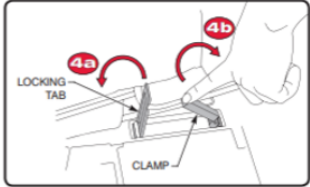


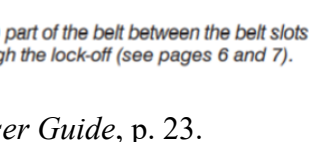
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>forwardly and upwardly from opposing sides of the seat portion proximate to the first belt path;</p>	<div data-bbox="856 362 1266 492"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> </div> <div data-bbox="1287 367 1661 597"> </div> <div data-bbox="856 500 1266 605"> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> </div> <div data-bbox="856 613 1266 849"> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> </div> <div data-bbox="1287 613 1661 846"> </div> <div data-bbox="856 873 1266 946"> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> </div> <div data-bbox="856 954 1266 1141"> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1287 862 1661 1092"> </div> <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

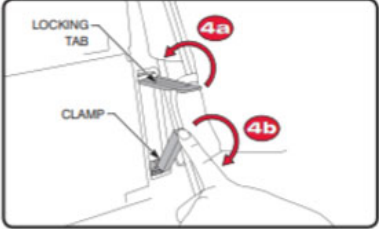
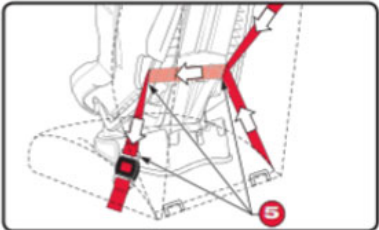

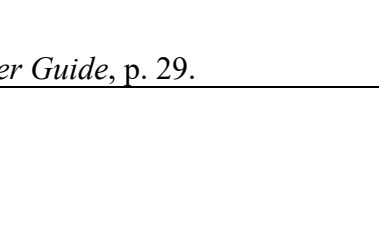
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

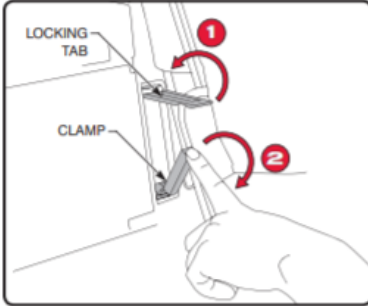
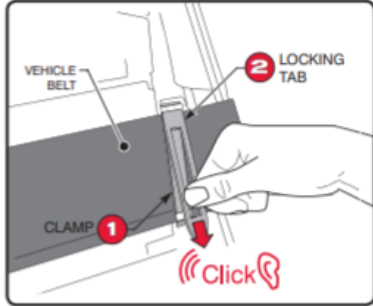

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(b)(1)] a pivot structure having a first pivot portion comprising a first lateral edge member and a second lateral edge member,	<p><i>Boulevard 70 CS</i> discloses or renders obvious a pivot structure having a first pivot portion comprising a first lateral edge member and a second lateral edge member. <i>Boulevard 70 CS User Guide</i>, p. 23, 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>

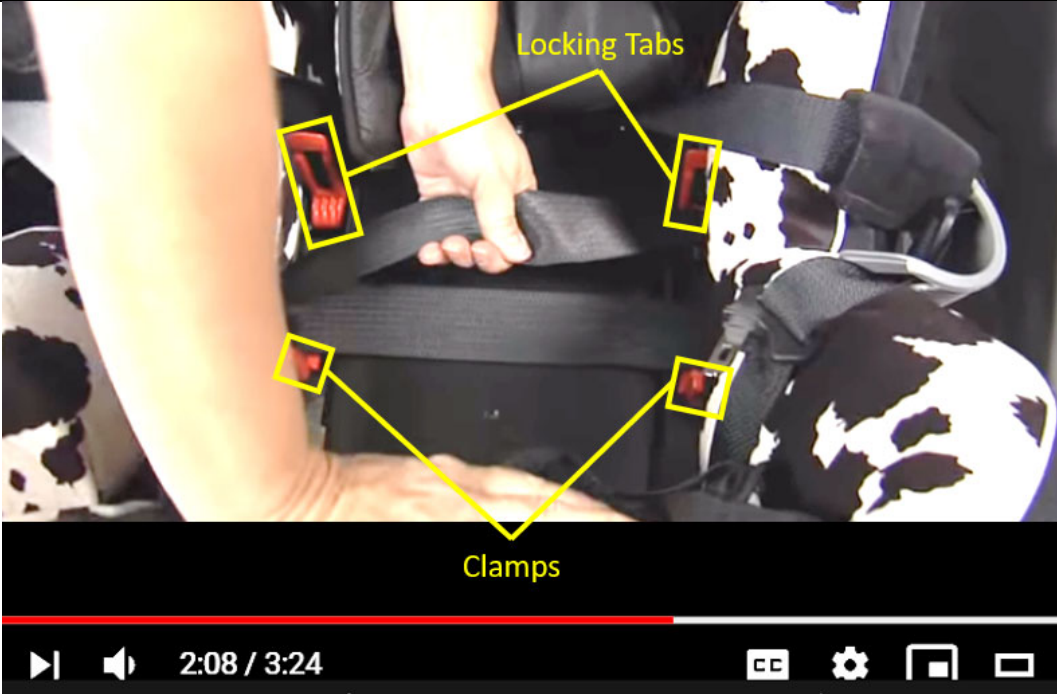


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> </div> </div> <div style="text-align: center; margin-top: 20px;">  </div> <p style="text-align: right; margin-top: 20px;"><i>Id.</i>, p. 14.</p>



## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="583 1031 1915 1101"><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p data-bbox="573 1141 1925 1320">Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>’s pivot structure. Furthermore, although <i>Yamazaki</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Yamazaki</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Yamazaki</i> discloses:</p> <p data-bbox="669 1360 1904 1427">“The base 10 is fastened to the passenger seat 7 by a lap-and-diagonal seat belt 4. The seat belt 4 has a diagonal section 4a extending between a tongue plate 5 (FIG. 5) to be engaged with a latch</p>

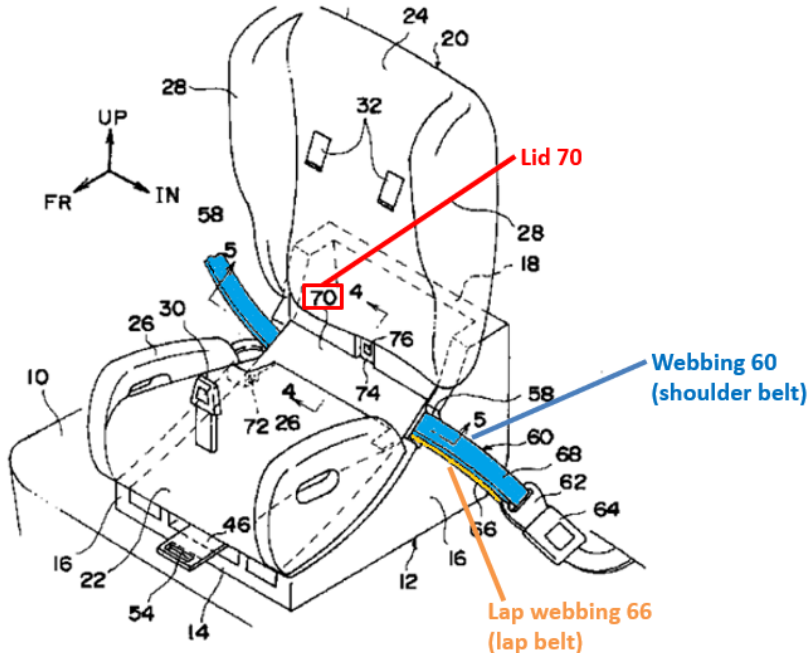
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>6 (FIG. 5) connected to the floor of the vehicle and a retractor (not shown), and a lap section 4b extending between the tongue plate 5 (FIG. 5) and an anchor (fixed member) 9 (FIG. 5).” <i>Yamazaki</i>, 3:30-36.</p> <p>“Step 1: The base 10 is set on the passenger seat 7 of the vehicle. Step 2: The tongue plate 5 of the seat belt 4 is engaged with the latch 6 with the lap section 4b of the seat belt 4 extended under the lever 12 of the seat belt tightening mechanism 11.” <i>Id.</i>, 4:27-32.</p> <p style="text-align: center;"><b>FIG. 1</b> <i>Id.</i>, Fig. 1.</p>

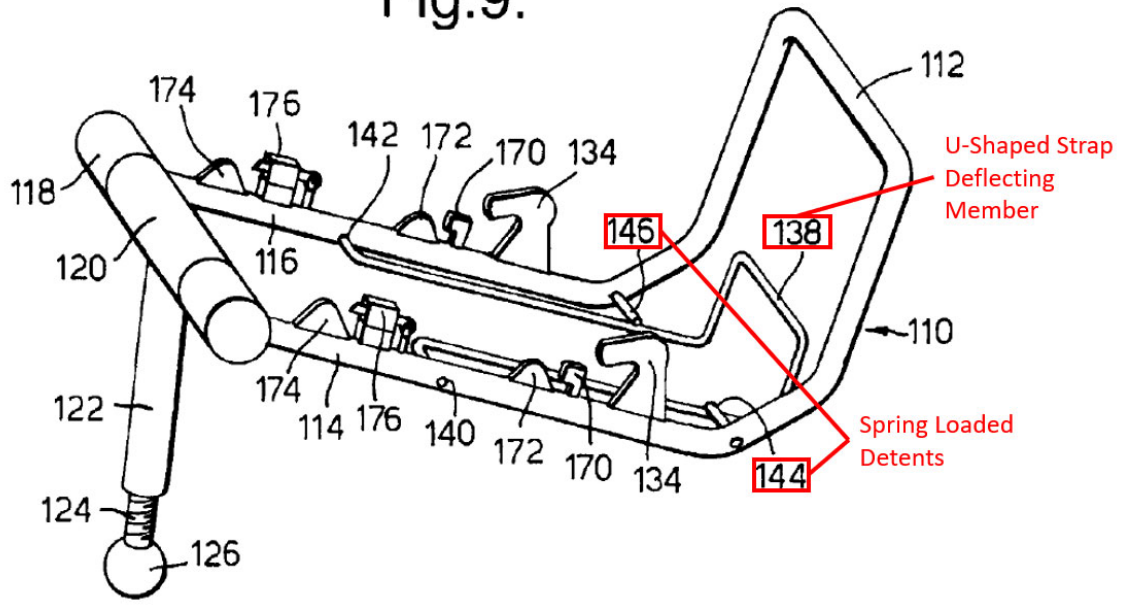
## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>In another alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Washimi</i>’s pivot structure. Furthermore, although <i>Washimi</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Washimi</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Washimi</i> discloses:</p> <p>“In the straddle part 56, the webbing 60 is positioned with the lap webbing 66 and shoulder webbing 68 stacked together in a state where the tongue plate 62 is engaged with the buckle device 64.” <i>Washimi</i>, ¶[0023].</p> <p><i>Id.</i>, Fig. 1 (annotated).</p>

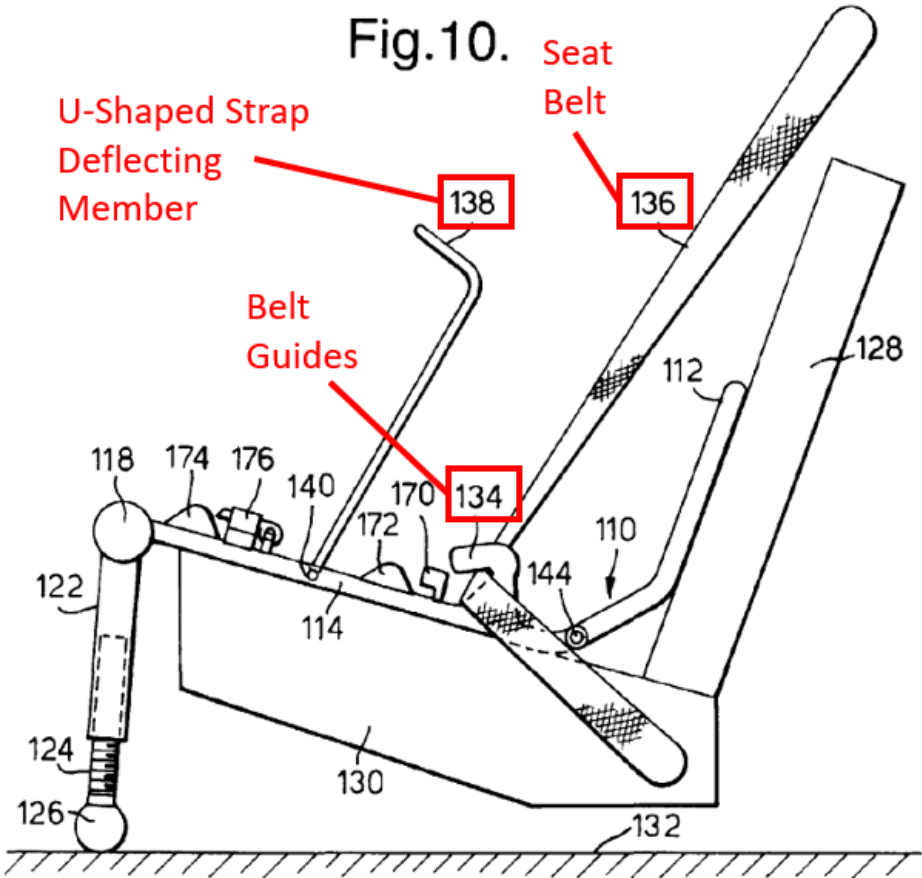
## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1102 1015 1396 1047"><i>Id.</i>, Fig. 2 (annotated).</p> <p data-bbox="577 1088 1921 1266">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Wetter</i>’s pivot structure. Furthermore, although <i>Wetter</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Wetter</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Wetter</i> discloses:</p> <p data-bbox="661 1307 1879 1404">“During installation, both the lap and shoulder portions of an adult seat belt 136 for the vehicle seat 128, 130 are engaged round the belt guides 134 as shown in Figure 10. Next, a U-shaped strap deflecting member 138, which has its ends pivotally engaging in holes 140 and 142 in</p>

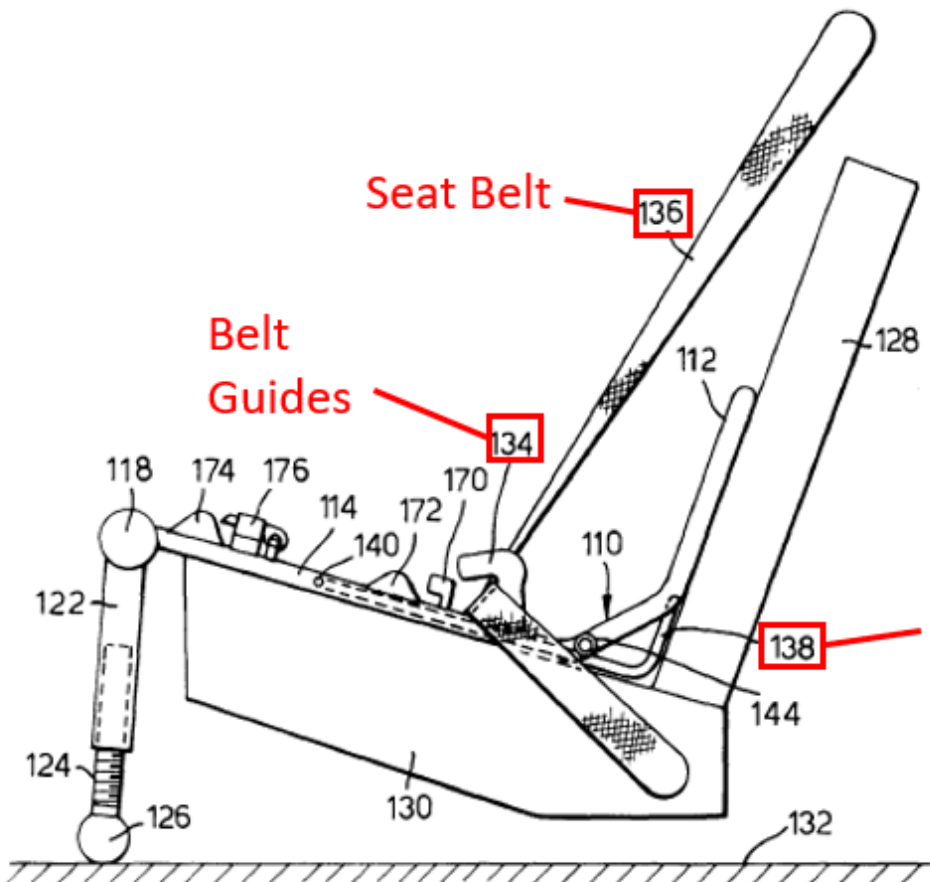
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>the side limbs 114 and 116 of the base member, is pivoted downwardly from the position shown in Figure 10 to the position shown in Figure 11 in which it deflects the adult seat belt 136 downwardly between the belt guides 134, thereby tightening the belt 136 and compressing the springs of the seat cushion 130 of the vehicle seat. The deflection member 138 is held in the position shown in Figures 9 and 11 (in which it lies substantially parallel to the limbs 114 and 116 of the base member) by springloaded detents 144 and 146 on the base member 110 adjacent to the junctions between the central portion 112 and the end portions 114 and 116 respectively.”  <i>Wetter</i>, 5:6-23.</p> <p style="text-align: center;"><b>Fig.9.</b></p>  <p style="text-align: right;">U-Shaped Strap Deflecting Member</p> <p style="text-align: right;">Spring Loaded Detents</p> <p style="text-align: center;"><i>Id.</i>, Fig. 9 (annotated).</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p data-bbox="1115 370 1276 423">Fig.10.</p>  <p data-bbox="827 451 1079 581">U-Shaped Strap Deflecting Member 138</p> <p data-bbox="1310 391 1381 472">Seat Belt 136</p> <p data-bbox="1016 646 1129 727">Belt Guides 134</p> <p data-bbox="1094 1263 1394 1292"><i>Id.</i>, Fig. 10 (annotated).</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1071 1299 1386 1331"><i>Id.</i>, Fig. 10 (annotated).</p> <p data-bbox="567 1364 1911 1429">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p><i>Uppa Baby Mesa</i>'s pivot structure. Furthermore, although <i>Uppa Baby Mesa</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Uppa Baby Mesa</i>'s pivot structure into <i>Boulevard 70 CS</i>'s child seat. For example, literature disclosing the <i>Uppa Baby Mesa</i> discloses:</p>

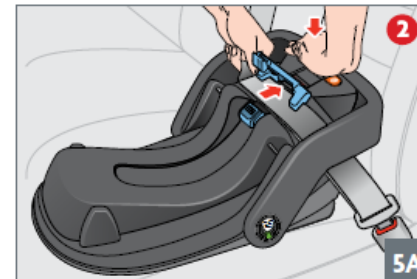
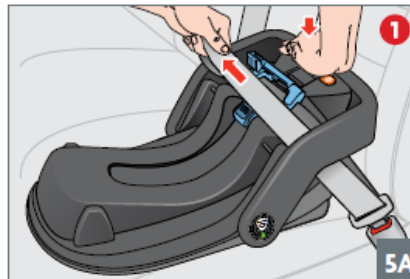
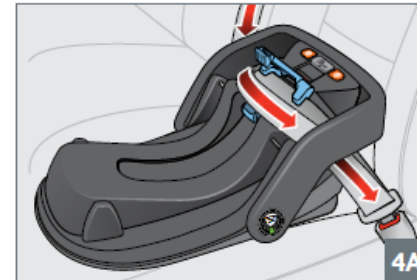


## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504



## SECURING THE BASE (LAP AND SHOULDER BELT INSTALLATION)

**STEP 4A:** Route the vehicle belt through the belt path while guiding the lap portion of the belt as close as possible to the top of the lock-off where the door hinges. Buckle the vehicle belt.



**STEP 5A:** Hold shoulder portion of belt above base. With one hand push down base in the direction of the seat bight (crease of seat) and hold firm as you pull shoulder belt **1**. While holding taut, slide shoulder belt back through the belt path as close as possible to the top of the lock-off **2**.

**NOTE: TIGHTNESS INDICATOR SHOULD BE GREEN.**



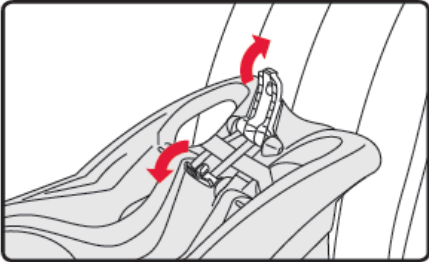
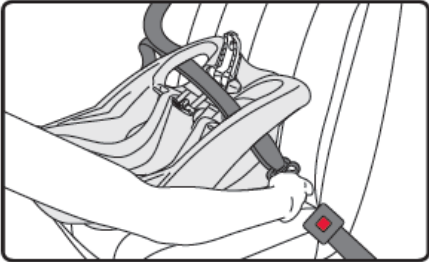

**STEP 6A:** Close the lock-off door.

**NOTE:** Check that the belt doesn't move more than 1 inch at belt path. If you are having trouble achieving a secure installation in the center seat position, please install using the locking clip (pg. 28).



BASE INSTALLATION WITH VEHICLE SEAT BELT

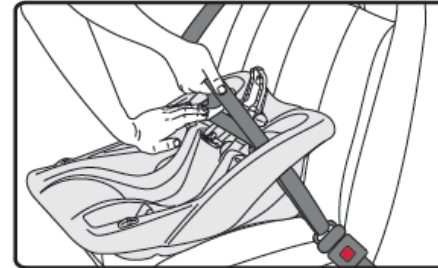
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p data-bbox="963 342 1524 375">Uppa Baby Mesa Instruction Manual, p. 23.</p> <p data-bbox="575 415 1921 630">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>B-Safe 35</i>’s pivot structure to satisfy this claim element. Furthermore, although <i>B-Safe 35</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>B-Safe 35</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>B-Safe 35</i> discloses:</p> <div data-bbox="831 672 1272 841"> <ul style="list-style-type: none"> <li>• <i>Place the base in the desired location on the vehicle seat and open the upper and lower portions of the lock-off.</i></li> <li>• <i>Pull the vehicle seat belt out.</i></li> </ul> </div> <div data-bbox="1289 675 1715 935">  </div> <div data-bbox="831 951 1268 1221"> <ul style="list-style-type: none"> <li>• <i>Ensure that the vehicle seat belt is not twisted and then route the vehicle belt under and through the first belt guide, through the open lock-off and down through the second belt guide.</i></li> <li>• <i>Buckle the vehicle seat belt.</i></li> </ul> </div> <div data-bbox="1289 951 1715 1211">  </div> <div data-bbox="743 1243 823 1299">  </div> <p data-bbox="1016 1312 1472 1344"><i>Britax B-Safe 35 User Guide, p. 16.</i></p>

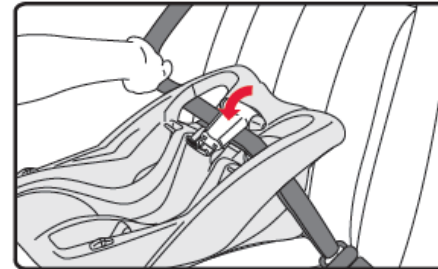
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

**Installing the Base**

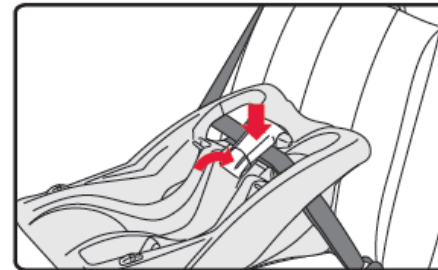
- *Press the base firmly into the vehicle seat while removing all slack from first the lap portion and then the shoulder portion of the vehicle seat belt.*



- *Hold the vehicle belt tight and close the upper portion of the lock-off.*



- *Press firmly on the upper portion of the lock-off and close the lower portion to secure.*

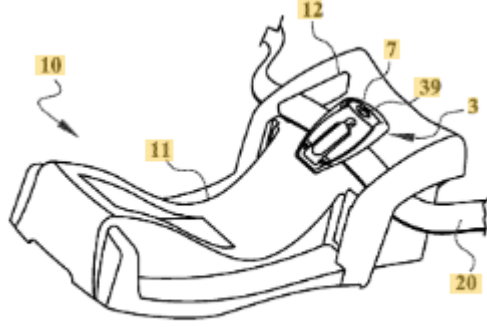
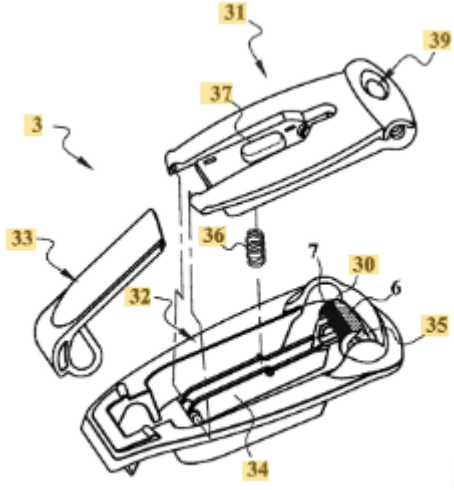


- *Verify that the vehicle belt is tight and that the base is secure. The base is secure when it moves less than 1 inch (2.5 cm) front-to-back or side-to-side at the vehicle belt path.*
- *Correct recline angle is achieved when the green marker on each recline angle indicator is visible between the two lines.*

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p><i>Id.</i>, p. 17.</p> <p>In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Williams</i>’s pivot structure to satisfy this claim element. Furthermore, although <i>Williams</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Williams</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Williams</i> discloses:</p> <p>“Referring to FIG. 1, the base 10 may be formed integrally in one piece or an assembly of multiply piece, having a curved supporting surface 11 for support a infant travel seat thereon and a pair of side guiding openings 12 for allowing a belt passing therethrough so as to secure the base 10 to the vehicle seat. Referring to FIGS. 2 and 3, the biting compartment 32 is formed on the base 10 between the pair of side guiding openings 12 where the belt 20 could pass is passing thereover. The covering plate 31 has one end coaxial with the colored rotor 35 and pivoted to one end of the biting compartment 32 for closing the biting compartment 32 when being rotated to a closed position, and another end pivoted with a rotatable depressor 34 for pressing the belt 20 into the biting compartment 32 when the covering plate 31 is rotated to and positioned in the closed position. [P]referably, a resilient element 36 may be mounted between the covering plate 31 and the rotatable depressor 34, so as to keep the rotatable depressor 34 in an opened position. In one embodiment, the resilient element 36 is a compression spring for biasing the rotatable depressor 34 downward and keeping in the opened position. When the covering plate 31 is carrying the rotatable depressor 34 to press the belt 20, it would compress the resilient element 36 and cause the rotatable depressor 34 to rotate and close to the covering plate 31 to a closed position.” <i>Id.</i>, 2:49-3:7.</p> <p>“Referring to FIGS. 5 and 6, before tying the base <b>10</b> to a vehicle seat, the belt <b>20</b> is passing through the pair of side guiding openings <b>12</b> and secure its free end to an anchor which is</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>mounted within the vehicle seat. By this way, may secure the base <b>10</b> to the vehicle seat tightly.” <i>Id.</i>, 3:41-45.</p> <p>“In order to inhibit the sliding between the base <b>10</b> and belt <b>20</b>, the user may rotate the covering plate <b>31</b> to close the biting compartment <b>32</b>, thus would carry the rotatable depressor <b>34</b> to press the belt <b>20</b> into the biting compartment <b>32</b>. After being closed the covering plate <b>31</b>, the user may rotate the holding plate <b>33</b> to engage and lock the covering plate <b>31</b> in the closed position.” <i>Id.</i>, 3:16-52.</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p style="text-align: center;"><i>Id.</i>, FIGS. 1, 2.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

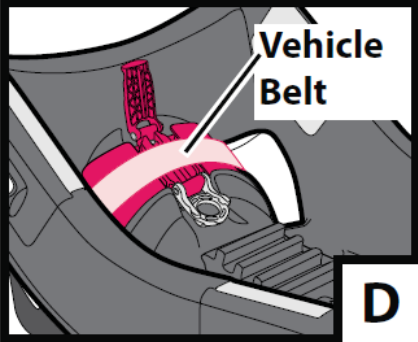
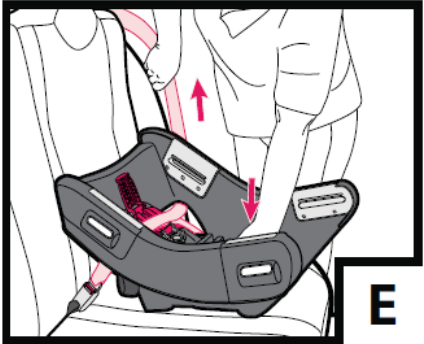


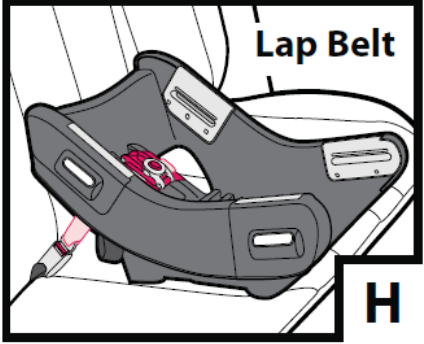
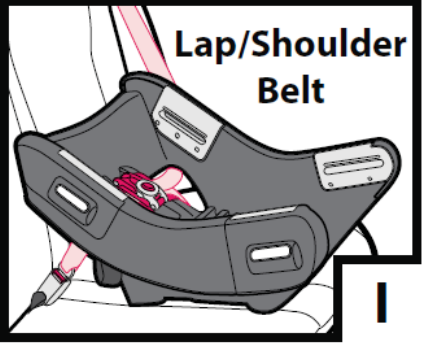
<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p style="text-align: center;"><b>FIG. 5</b></p> <p style="text-align: center;"><i>Id.</i>, FIG. 5.</p> <p>In a further alternative, to the extent <i>the Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill in the art to have improved <i>the Boulevard 70 CS</i> with <i>Graco Smart Seat</i>’s pivot structure. Furthermore, although <i>Graco Smart Seat</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Graco Smart Seat</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Graco Smart Seat</i> discloses:</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>When using the vehicle seat belts to install the base, the lock-off is <b>ALWAYS</b> used to secure both belts of the lap or lap/shoulder belt.</p> <ol style="list-style-type: none"> <li>1. Position base in vehicle seat as shown <b>C</b>.</li> <li>2. Open the lock-off and route the vehicle belt through the belt path and over the lock-off <b>D</b>.</li> <li>3. Buckle seat belt. Pull up on shoulder belt while pushing down on base to tighten <b>E</b>.</li> <li>4. Close lock-off <b>F</b>.</li> <li>5. Test base for secure installation by moving front to back and left to right at the belt path <b>G</b>. Base should not move more than 1 inch ( 2.54 cm). If belt loosens or lengthens, repeat procedure.</li> </ol> <p>Lap Belt <b>H</b> and Lap/Shoulder Belt <b>I</b> should appear as shown when installed.</p> <p style="text-align: center;"><b>30</b></p> <p style="text-align: center;"><i>Graco Smart Seat Owner's Manual, p. 30.</i></p>



## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

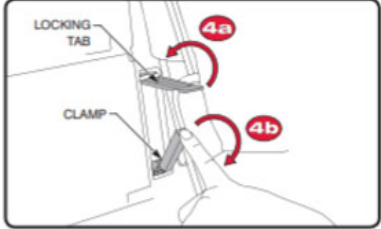
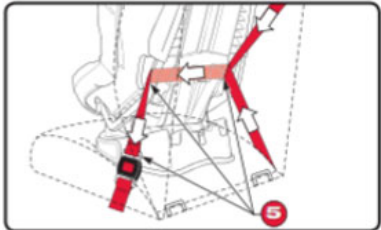

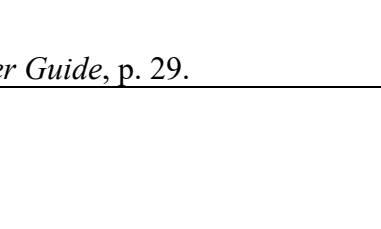
Claim	Invalidity Chart for U.S. Patent No. 9,586,504
	Prior Art
	<div data-bbox="585 347 1005 688">  <p><b>D</b></p> </div> <div data-bbox="1037 347 1457 688">  <p><b>E</b></p> </div> <div data-bbox="1488 347 1908 688">  <p><b>F</b></p> </div> <div data-bbox="585 704 1005 1045">  <p><b>G</b></p> </div> <div data-bbox="1037 704 1457 1045">  <p><b>H</b></p> </div> <div data-bbox="1488 704 1908 1045">  <p><b>I</b></p> </div> <p style="text-align: center;"><b>31</b></p> <p style="text-align: center;"><i>Id.</i>, p. 31.</p> <p>One of ordinary skill in the art would have been motivated to combine <i>the Boulevard 70 CS</i> with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i>, and/or <i>Graco Smart Seat</i> because these references teach systems securing child seats to vehicle seats using securing mechanisms. The <i>Boulevard 70 CS</i> uses a pivot structure to ensure “that the child seat cannot be moved front to back or side to side more than 1 in. (2.5 cm) at the belt path. If the child seat is not secure, repeat installation or use a different seating location.” <i>Boulevard CS 70 User Guide</i>, p. 21, 23, 25, 27, 29, 31. As identified,</p>



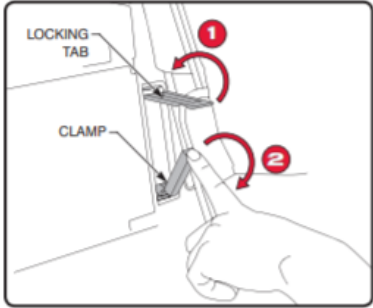
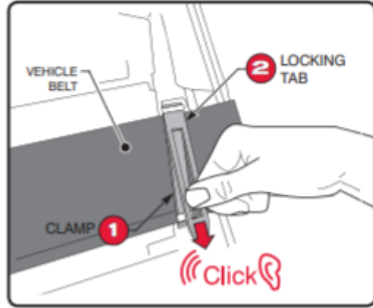

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p>the installation of <i>Boulevard 70 CS</i>'s child seat can sometimes result in loose installations. <i>Id.</i> Therefore, a person of ordinary skill in the art would have looked to improve <i>Boulevard CS 70</i>'s locking tabs with one of the pivot structures disclosed in <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(b)(2)] the pivot structure attached to the backrest portion at an axis such that the pivot structure rotates between a first position and a second position pivotally about the axis, the first and second lateral edge members extending away from the backrest and substantially perpendicular to the axis,	<p><i>Boulevard 70 CS</i> discloses or renders obvious the pivot structure attached to the backrest portion at an axis such that the pivot structure rotates between a first position and a second position pivotally about the axis, the first and second lateral edge members extending away from the backrest and substantially perpendicular to the axis. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

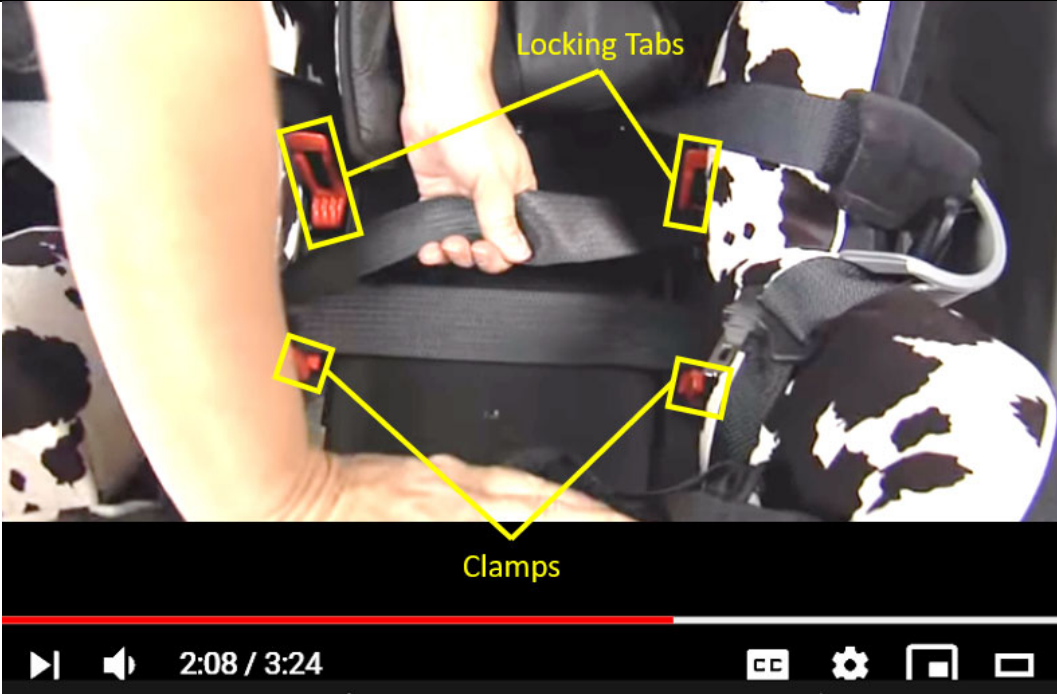
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p>     <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p> 14</p> <p><i>Id.</i>, p. 14.</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

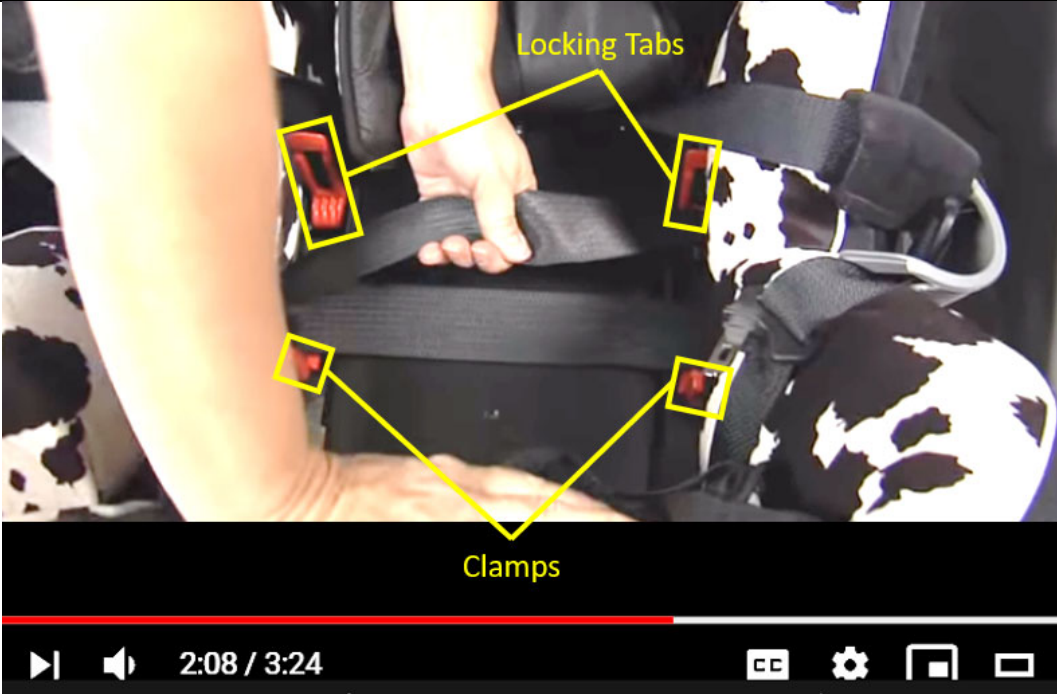
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(b)(3)] wherein in the first position, the first pivot portion is substantially adjacent to the seat base, and wherein	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the first position, the first pivot portion is substantially adjacent to the seat base, and wherein in the second position, the first pivot portion is at least partly displaced from the seat base in order to enable the second belt path to receive the belt. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>in the second position, the first pivot portion is at least partly displaced from the seat base in order to enable the second belt path to receive the belt;</p>	<div data-bbox="856 363 1276 1143"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab</p> <p>b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt</p> <p>b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1289 363 1667 1094"> </div>

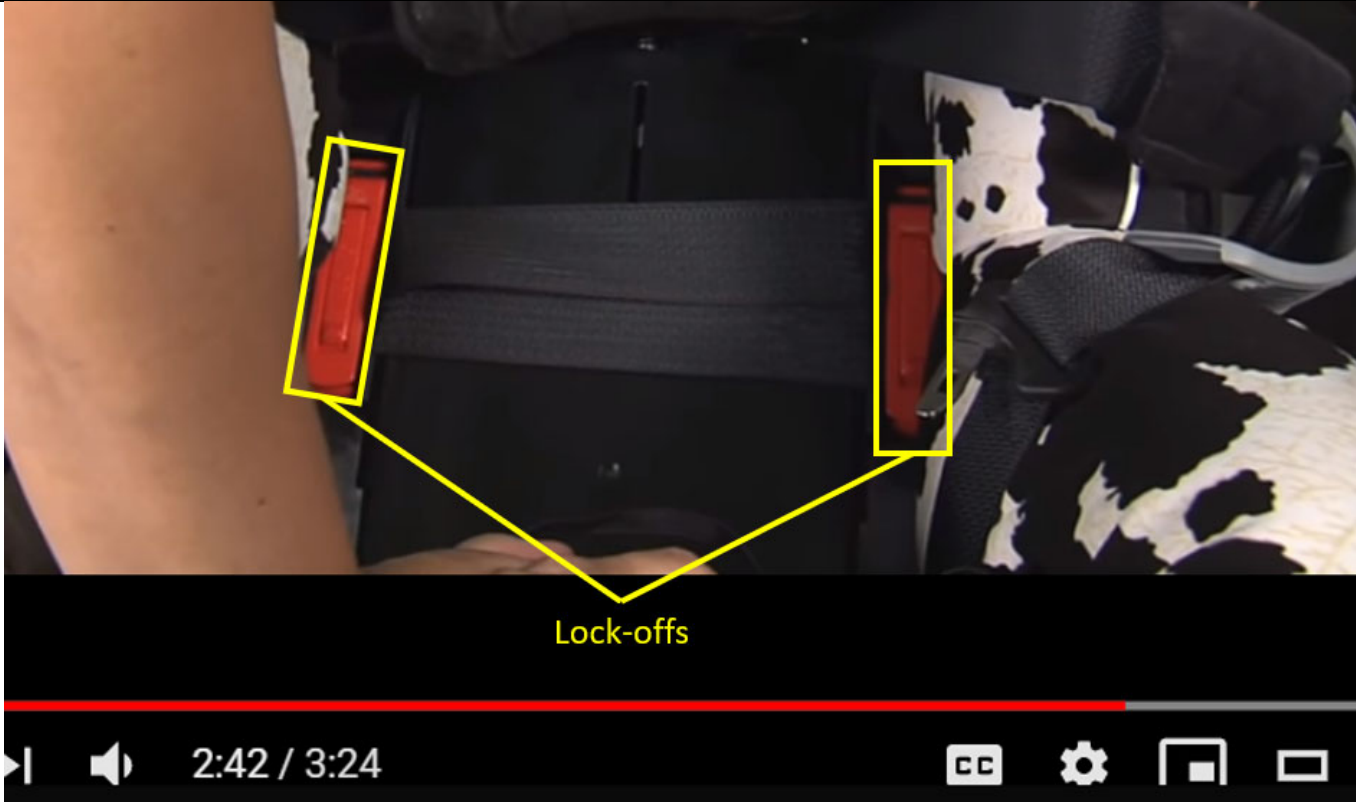
*Boulevard 70 CS User Guide, p. 29.*

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

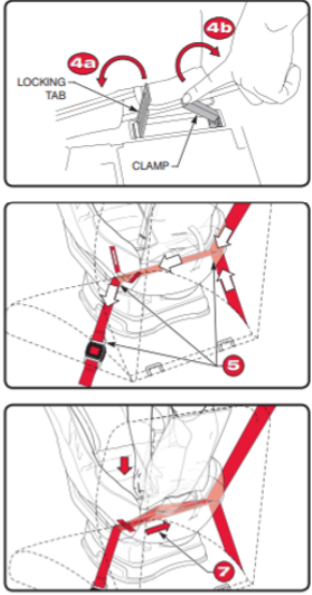
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(c)(1)] the pivot structure having a second	<i>Boulevard 70 CS</i> discloses or renders obvious the pivot structure having a second pivot portion comprising a third lateral edge member and a fourth lateral edge member. <i>Boulevard 70 CS User Guide</i> ,

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

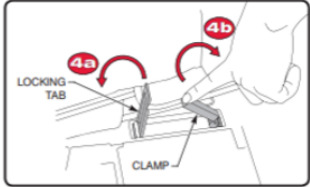


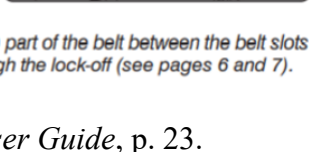
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>pivot portion comprising a third lateral edge member and a fourth lateral edge member,</p>	<p>p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div data-bbox="919 435 1585 1101"> <p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>  </div> <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(c)(2)] the third and fourth lateral edge members moving between a third position proximate to the seat portion and a fourth position at least partly displaced from the	<p><i>Boulevard 70 CS</i> discloses or renders obvious the third and fourth lateral edge members moving between a third position proximate to the seat portion and a fourth position at least partly displaced from the seat portion in order to enable the first belt path to receive the belt. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
seat portion in order to enable the first belt path to receive the belt,	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>

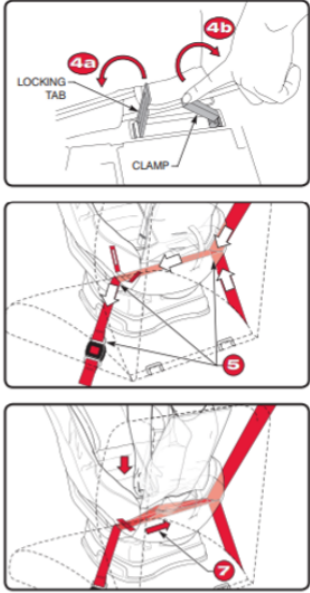
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(d)] wherein the first belt path is configured to allow a user to position the belt to be displaced by the third and fourth lateral edge members relative to the third and fourth lateral edges to secure the child seat to the vehicle seat when the child seat is in	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path being configured to allow a user to position the belt to be displaced by the third and fourth lateral edge members relative to the third and fourth lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
the rear-facing orientation, and	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>  <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

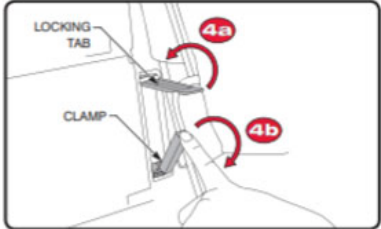
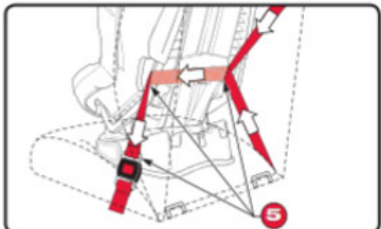

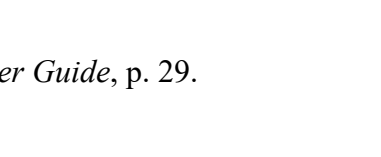

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

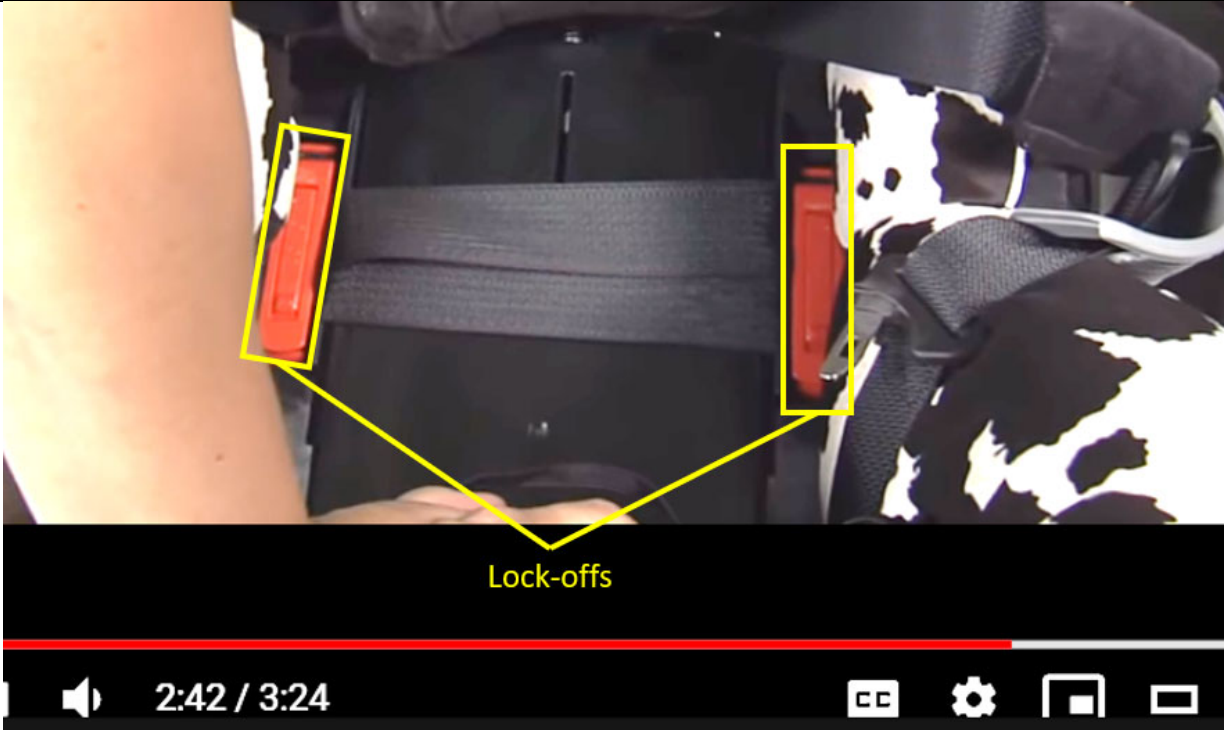
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s pivot structure, as discussed in element 13(b)(1).</p> <p>See claim element 13(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(e)] wherein the second belt path is configured to allow the user to position	<i>Boulevard 70 CS</i> discloses or renders obvious the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edge members relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>the belt to be displaced by the first and second lateral edge members relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.</p>	<p>facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, p. 29.</p> </div> <div style="width: 35%;">      </div> </div>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s pivot structure, as discussed in element 13(b)(1).</p> <p>See claim element 13(b)(1) for the motivation to combine.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
14. The child seat according to claim 13, wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.	See claim 2.  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 14.
15. The child seat according to claim 13, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.	See claim 3.  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 15.